

# PHA 5-Year and Annual Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB No. 2577-0226  
Expires 4/30/2011

1.0	<b>PHA Information</b> PHA Name: <u>Housing And Community Services Agency of Lane County OR</u> PHA Code: <u>OR006</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing <input type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>10/01/2012</u>				
2.0	<b>Inventory</b> (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: <u>708</u> Number of HCV units: <u>2817</u>				
3.0	<b>Submission Type</b> <input type="checkbox"/> 5-Year and Annual Plan <input checked="" type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only				
4.0	<b>PHA Consortia</b> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)				
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program PH HCV
	PHA 1:				
	PHA 2:				
	PHA 3:				
5.0	<b>5-Year Plan.</b> Complete items 5.1 and 5.2 only at 5-Year Plan update.				
5.1	<b>Mission.</b> State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years:  Working together we are making a difference in the quality of housing and related community services.				
5.2	<b>Goals and Objectives.</b> Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.				
6.0	<b>PHA Plan Update</b> (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:  See Section 2 for Annual Plan updates.  (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.  177 Day Island Rd, Eugene, OR 300 W Fairview Driver, Springfield, OR All Public Housing Sites				
7.0	<b>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers.</b> Include statements related to these programs as applicable.				
8.0	<b>Capital Improvements.</b> Please complete Parts 8.1 through 8.3, as applicable.				
8.1	<b>Capital Fund Program Annual Statement/Performance and Evaluation Report.</b> As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> , form HUD-50075.1, for each current and open CFP grant and CFFP financing.				
8.2	<b>Capital Fund Program Five-Year Action Plan.</b> As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i> , form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.				
8.3	<b>Capital Fund Financing Program (CFFP).</b> <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.				

9.0	<p><b>Housing Needs.</b> Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p>
9.1	<p><b>Strategy for Addressing Housing Needs.</b> Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. <b>Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</b></p>
10.0	<p><b>Additional Information.</b> Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.</p> <p>HACSA is meeting the goals listed in the 5 - Year Plan and has provided an update on each of the goals. That update was made public as part of the Plan.</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"</p>
11.0	<p><b>Required Submission for HUD Field Office Review.</b> In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. <b>Note:</b> Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights)</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.</p> <p>(g) Challenged Elements</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>

Plan Updates and Plan Elements  
Section 6.0 of HUD form 50075  
May 2012

**Plan Updates:**

Section 8 Administrative Policy –

- ✓ Added a Local Preference for clients of Sponsors, Inc. Transitional Housing Program. This preference is for clients of Sponsors who are residing in transitional housing and who meet HUD's definition of homelessness and are receiving case management to promote long term stability. Clients must remain case managed and reside for a period of two years at Village Oaks Apartments or Firwood Apartments. Five (5) Housing Choice Vouchers are allocated for this preference.
- ✓ Added a Local Preference for veteran families who meet HUD's definition of homelessness and are clients of St. Vincent de Paul. Clients must remain case managed and live in the Stellar Apartments for one year. Four (4) Housing Choice Vouchers are allocated for this Preference. VASH holders are not eligible. Note: this Preference goes into effect at the completion of construction of the Stellar Apartments (2013).
- ✓ Added residency requirement under Portability. If neither the head of household nor the spouse/co-head of an applicant family had a domicile (legal residence) in the PHA's jurisdiction at the time the application for assistance was submitted, the family must live in the PHA's jurisdiction with voucher assistance for at least 12 months before requesting portability.
- ✓ Corrected minor clerical errors.

Statement of Policy (Public and Assisted Housing) –

- ✓ Added Local Preference for Village Oaks Apartments (Assisted Housing) and Firwood Apartments (HACSA owned bond financed affordable housing property) for Section 8 Housing Choice Voucher holders who are receiving the Section 8 Homeless Local Preference Voucher.
- ✓ Added an exemption to the one-year clean and sober requirement in Section IX. Selection Standards for Admission, as it relates to our new Section 8 Homeless Local Preference for clients of Sponsors.

Operations and Management –

- ✓ In January of 2012, the Agency reported its semi-annual implementation review of the Agency's 2011 - 2015 Strategic Plan to the HACSA Board of Commissioners. At the same time, the 2012 strategies and actions were

reviewed and revised as necessary. The full Plan can be found on our website at [www.hacsa.org](http://www.hacsa.org), and in the lobbies of both Administrative offices.

- ✓ Maintenance Plan updated.
- ✓ Status Report on HACSA's Energy Plan included in Plan supporting documents.
- ✓ Analysis of Impediments to fair housing updated and added to Plan.

#### Capital Fund -

- ✓ Both American Recovery and Reinvestment Act (ARRA) grants were closed-out last fiscal year along with the 2007 and 2008 Capital Fund grants.
- ✓ Performance & Evaluation (P&E) reports for the period ending March 31, 2012 are included in this year's Plan for the 2009, 2010, and 2011 grants.
- ✓ The 2012 grant was awarded in March 2012. This grant was part of last year's 5-Year Capital Fund Plan, which was part of the public process. No new work items were added to this grant. The 2012 grant includes the following work:
  - AMP 200 – McKenzie Village, Pengra Court, and Scattered Sites, Springfield: Bath upgrades (continuing from FY 11) at McKenzie Village and Pengra Court.
  - AMP 300 – Maplewood Meadows and Scattered Sites, Eugene: New energy efficient ranges/hoods, low flow toilets, and driveways/sidewalks at Scattered Site Housing. New exterior lighting, to increase efficiency and safety at Maplewood Meadows.
  - AMP 500 – Veneta Villa, Veneta and Lindeborg Place, Junction City: Upgrade furnaces and lighting for energy efficiency at Veneta Villa. Upgrade community room at Lindeborg Place.
  - AMP 600 – Riverview Terrace, Cottage Grove and Cresview Villa, Creswell: Parking lot asphalt overlay at Riverview Terrace and Cresview Villa. Upgrade community room at Cresview Villa.
- ✓ A new 5<sup>th</sup> year (2016) was added to the 5 Year Capital Fund Plan. New work items include:
  - AMP 100 – Laurelwood Homes, Florence: New chain link fencing, and minor improvements to the three 4 bedroom units.
  - AMP 200 – McKenzie Village, Pengra Court, and Scattered Site Housing, Springfield: New roofs (phased project) and new fencing at McKenzie Village.
  - AMP 300 – Maplewood Meadows and Scattered Site Housing, Eugene: Install new fencing at multiple Scattered Site Housing locations, and install new windows at Maplewood Meadows.
  - AMP 400 – Parkview Terrace, Eugene: New mailboxes.
  - AMP 500 – Veneta Villa, Veneta and Lindeborg Place, Junction City: No new work added.
  - AMP 600 – Riverview Terrace, Cottage Grove and Creswell Villa, Creswell: New mailboxes and office remodel (Creswell).

#### Other Changes –

- ✓ Updated Resident Advisory Board members.
- ✓ Updated ROSS grant reports.
- ✓ Added updated Family Self-Sufficiency Program (FSS) Action Plan.
- ✓ Added Financial Statements for fiscal year ending September 30, 2011.
- ✓ Updated PHAS/SEMAP information.
- ✓ Updated Maintenance Plan.
- ✓ Added a progress report on the Agency's Energy Plan.

#### HACSA News –

- ✓ Hawthorn at 29<sup>th</sup> Apartments: Construction is underway at the Hawthorn at 29<sup>th</sup> Apartments, a rehabilitation of a 35-unit apartment complex serving adults with psychiatric disabilities. This project is in partnership with ShelterCare, who provides the supportive services to residents at the development.
- ✓ Norsemen Village: This month, rehabilitation work begins at this Agency owned complex in Junction City serving seniors and disabled adults. Construction work will include major upgrades to all the apartments along with a vastly-improved community building that serves all residents. Construction will run through May 2013.
- ✓ Glenwood River Point Place: HACSA was just named as a participant in the distinguished "Affordable Housing Design Leadership Institute", held in New York City this summer. One of only seven projects selected nationally, the Institute will bring together leaders around the country to focus on innovation and best practices in community design. Our project in Glenwood will provide 150 units of workforce housing above commercial space that is intended to jump-start economic development along Franklin Blvd.
- ✓ Other pipeline projects: HACSA staff are also working on development of an additional 68 units of affordable housing in two Eugene projects, Bascom Village and Turtle Creek Phase II. Both development projects are scheduled to begin construction in late 2013/early 2014.

## Plan Elements:

- 1. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

In the Public Housing Program, applicants are selected based on date and time of application.

In the Section 8 Voucher Program, applicants are selected from the waiting list by a lottery system.

The following local preferences are included in the Section 8 Admin Plan:

- LP 1 Stellar Apartments Preference Homeless Veteran Families- This preference is for preference homeless veteran families who meet the HUD definition of homeless and are clients of St. Vincent de Paul and who are receiving case management to promote long term stability. The family must reside in the Stellar Apartments at 17th and City View Streets, Eugene, Oregon for a period of no less than one (1) year and participate in case management. Four (4) Housing Choice Vouchers in the Section 8 Program are allocated for this preference.

Local Homeless Preference through Sponsors Inc- This preference is for clients of Sponsors who are residing in transitional housing and who meet the HUD definition of homelessness and are receiving case management to promote long term stability. The clients must remain in case management through Sponsors and reside for a period of two (2) years at the Village Oaks Apartments or Firwood Apartments that are owned and operated by HACSA. Five (5) Housing Choice Vouchers in the Section 8 Program are allocated for this preference.

Low income renters who are homeless as a result of fire. Families who claim they are being or have been displaced due to fire: must be a resident of Lane County and have written verification by the displacing unit or agency of government or a service agency such as the Red Cross. Referrals must be within 45 days of the displacement. Trailers are considered a permanent structure. Must meet all eligibility requirements of the Section 8 Program.

1915(c) Waiver. Through a Fair Share Voucher grant HACSA agreed to provide eight (8) Vouchers for disabled families living in Lane County who have a 1915(c) waiver administrated by the local Senior and Disabled Services office (S&DS).

Senior and Disabled Services- Title XIX clients. For clients of the local S&DS office who are eligible to receive Title XIX services, who meet the eligibility requirements for Section 8 and agreed to receive case management as long as they meet the Title XIX criteria. 25 Vouchers.

Victims of domestic violence. For clients who are in a transitional housing program through WomenSpace and meet the eligibility requirements of the Section 8 Program and agree to one (1) year of case management. 25 Vouchers.

Shelter Plus Care Program participants. To qualify, the participant must be on the Shelter Plus Care Program for at least two years, be in compliance with case management requirements, and not violated their Family Obligations. 25 Vouchers.

State of Oregon Foster Care Program. For children in the foster care system. (Preference will be fully developed with community partners prior to implementing the preference.) 25 Vouchers.

New Winds Apartments, Florence Oregon. This preference is for unaccompanied homeless persons living in Florence Oregon who are disabled. The disabled individual agrees to receive case management for a period of two (2) years and to reside for those two (2) years in one of 16 units at the New Winds Apartment complex in Florence Oregon. Case management will be through Peace Health Counseling Services or Options Counseling in Florence Oregon.

Under the Local Preference 1, with the exception of LP1 Fire Displaced and 1915 ©) Waiver, housing assistance is predicated on the qualifying individuals continuing participation and cooperation with case management services through the participating agency. If the individual leaves the household or discontinues case management services (whether voluntarily or terminated by the participating agency) the housing assistance will be discontinued. The remaining household members do not have eligibility for continued rental subsidy under the Section 8 Program. HACSA reserves the right to deactivate any Local Preference if it does not have available slots or funding becomes unavailable.

- LP 2 Preference will be given to participants who are currently receiving housing assistance from the HA who have requested a transfer between HA programs and the transfer is consider by the HA, to be in the HA's best interest.
- LP 3 Preference will be given to participants who are currently receiving housing assistance from the HA and are over/under housed according to the occupancy guidelines for their current housing program and the transfer is in the best interest of the HA.
- LP 4 This preference will be implemented when the HA has determined that the preference is needed to meet HUD's regulation that 75% of all new admissions must be at or below 30% of the area median income.
- LP 5 Public Housing de-concentration preference.
- LP 6 Village Oaks student preference.

LP 7 Preference will be given to applicants who are not currently residing or participating in the following programs: Public Housing, Abbie Lane, Section 8 Voucher, or other subsidized housing programs where they are paying 30% (or less) of their adjusted gross income towards rent. (Not currently being subsidized)

LP 8 All others.

All other applicants, includes applicants who are currently residing in Public Housing, Fourteen Pines or Abbie Lane units or a participant in the Section 8 Voucher, or other subsidized housing programs where they are paying 30% or less of their adjusted gross income towards rent. (Currently being subsidized)

The following local preferences are part of the PH Statement of Policy:

A. Local Preferences for Public Housing:

Each application will be screened to determine the Local Preference, if any, for which the Applicant may be eligible. HACSA will keep a separate waiting list for each of the following geographic areas:

1. Metro (Eugene/Springfield)
2. Outlying Areas (Cottage Grove/Creswell/Junction City/Veneta)
3. Florence

Within each geographic area the waiting list is organized by bedroom size. Applicants will be placed on the waiting list(s) for the geographic area(s) chosen by the Applicant, and the appropriate bedroom size. Applicants are ranked on the waiting list(s) by Local Preference. An Applicant's local preference carries a point value (see below). An Applicant household will receive the single most advantageous Local Preference for which they qualify. Applicant households with the same Local Preference will be ranked by date and time of application. In addition, Elderly and Disabled applicants will receive preference at the following complexes (and units):

- Parkview Terrace
- McKenzie Village (one-bedroom units)
- Riverview Terrace
- Cresview Villa
- Lindeborg Place
- Veneta Villa
- Laurelwood Homes (one-bedroom units)

Households applying or qualifying for these complexes (or units) who do *not* qualify as an Elderly/Disabled Family (see Appendix E, Definition of Terms §10.B.) will be assigned the "Non-Elderly/Disabled" local preference (see below).



B. Local Preferences for Assisted Housing (Abbie Lane, Fourteen Pines and Village Oaks):

Each application will be initially screened to determine the local preference, if any, for which the Applicant may be eligible. Applicants will be placed on the waiting list(s) for the complexes chosen by the Applicant and the appropriate bedroom size. Applicants are ranked on the waiting list(s) by local preference. An Applicant's local preference carries a point value (see below). An Applicant household will receive the single most advantageous Local Preference for which they qualify. Applicant households with the same Local Preference will be ranked by date and time of application. In addition, Elderly and Disabled applicants receive preference at the following complexes (and units):

- Fourteen Pines (one-bedroom units)
- Village Oaks (one-bedroom units)

Households applying or qualifying for these units who do *not* qualify as an Elderly/Disabled Family (see Appendix E, Definition of Terms §10.B.) will be assigned the "Non-Elderly/Disabled" local preference (see below). At Village Oaks, non-elderly/disabled Applicants who apply or qualify for a one-bedroom unit and who qualify for the LCC or other student preference, **or who hold a HACSA Section 8 Homeless Local Preference Voucher**, will receive the LCC or other student preference **or Homeless Local Preference Voucher preference** and will *not* be assigned the non-elderly/disabled local preference.

C. Local Preference Ranking Order for Public and Assisted Housing (with point value):

- LP1 (80) Fourteen Pines and Village Oaks: Preference will be given to Applicants who have been displaced from an urban renewal area, or as a result of governmental action, or as a result of a disaster determined by the President to be a major disaster.
- (80) Section 8 - Housing Choice Voucher Program: See HACSA's Section 8 Housing Choice Voucher Program Administrative Plan for qualifying events.
- LP2 (70) Preference will be given to Participants currently receiving housing assistance from HACSA and whose transfer between HACSA programs is considered, by HACSA, to be in HACSA's best interest. (Upon approval of this Local Preference, the Participant will be required to complete an Application for the applicable program and to be placed on the waiting list.)
- LP3 (60) Preference will be given to Participants currently receiving housing assistance from HACSA who are over or under-housed and whose transfer is considered, by HACSA, to be in HACSA's best interest. (Upon approval of this Local Preference, the Participant will be required to complete an Application for the applicable program and to be placed on the waiting list.)

- LP4 (50) This preference will be implemented when HACSA determines it is needed to meet the requirement that 40% of new admissions to Public Housing and project-based Section 8 units be at or below extremely low-income (30% of area median income).\*
- LP5 (40) This preference will be implemented when HACSA determines it is needed to meet HUD regulations for the deconcentration of poverty in Public Housing.\*
- LP6 (35) Village Oaks and Firwood Apartments: Preference will be given to Applicants attending Lane Community College (LCC) on a “full-time” basis (as defined by LCC) at the time of their admission to HACSA housing. Applicants not enrolled for Summer Term may qualify for this preference if they attended Spring Term full-time or are enrolled full-time for Fall Term (subject to verification). **Preference will also be given to Applicants holding a Section 8 Voucher under HACSA’s Homeless Local Preference.**
- LP7 (30) Village Oaks: Preference will be given to Applicants attending school on a full-time basis (as defined by the educational institution) at the time of admission to HACSA housing. Applicants not enrolled for Summer Term may qualify for this preference if they attended Spring Term full-time or are enrolled full-time for Fall Term (subject to verification).
- LP8 (20) Preference will be given to Applicants who are not currently residing or participating in Public Housing, Section 8 assistance (project-based or Housing Choice Voucher), or other subsidized housing programs where they are paying 30% (or less) of their adjusted gross income for rent. (Participants not the head-of-household or spouse may apply for Public Housing and Assisted Housing under their own application and receive the LP8 preference.)
- LP9 (10) All other applicants (head-of-household or spouse), includes applicants who are currently residing in Public Housing, Section 8 (project-based or Housing Choice Voucher) or other subsidized housing programs where they are paying 30% or less of their adjusted gross income towards rent.

Applicant households who apply or qualify for those complexes or units where HACSA maintains an elderly/disabled preference and who do *not* qualify as an Elderly/Disabled Family (see Appendix E, Definition of Terms §10.B.) *do not qualify* for the LP8 or LP9 preference.

- LP10 (-100) Non-Elderly/Disabled Applicant households applying or qualifying for those complexes and units where HACSA maintains an elderly/disabled preference.

\*Local Preferences 4 and 5 will be used when HACSA determines that it needs to apply those preferences to fulfill the respective requirements. These preferences will first be applied to Applicants who have received a Top-of-the-List (TOL) notice. If HACSA is unable to find an eligible applicant who has received a TOL notice, HACSA may apply these preferences to a group of applicants near the top of the waiting list. The application of these preferences may reorder the placement of applicants on the waiting list. At the time of an Applicant's prospective admission, HACSA staff will determine if that admission would cause HACSA to not meet the respective requirements (i.e. income targeting or deconcentration of poverty). If HACSA staff determines it would *not* cause HACSA to not meet the requirement(s), no further action will be taken. If HACSA staff determines the admission *would* cause HACSA to not meet the requirement(s), the applicable preference(s) will be applied and HACSA staff will document the affected Applicants' case record.

D. Accessible Units:

Units that are fully wheelchair accessible will be assigned in accordance with Section XI.M, with preference being given to Residents or Applicants with a documented need for these features.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.

**HACSA BUDGET -  
SUMMARY OF RESOURCES -  
FY 12**

DIVISION/ PROGRAM	LOAN/ FUND BALANCE	FEDERAL REVENUE	RENT	INTEREST	OTHER	TOTAL
<b>CSA:</b>						
Weatherization		2,039,400			375,000	2,414,400
Development				50,000	407,700	457,700
Norsemen Village	872,300	2,568,800	95,000	400	2,000	3,538,500
Camas Place		97,100	98,000	100	5,000	200,200
FSH			27,000			27,000
Heeran Center			181,500	500		182,000
Signpost House			75,000		6,200	81,200
Shelter + Care		423,100				423,100
Richardson Bridge			170,000	100	2,500	172,600
	<b>872,300</b>	<b>5,128,400</b>	<b>646,500</b>	<b>51,100</b>	<b>798,400</b>	<b>7,496,700</b>
<b>HOUSING:</b>						
Conventional		1,915,300	1,700,300	11,400	160,300	3,787,300
Abbie Lane		200,000	32,000	1,000	1,500	234,500
Fourteen Pines		330,700	136,000	500	12,000	479,200
Village Oaks		63,700	317,000	1,200	9,000	390,900
Firwood			435,600	1,000	8,000	444,600
Capital Fund		1,899,000				1,899,000
		<b>4,408,700</b>	<b>2,620,900</b>	<b>15,100</b>	<b>190,800</b>	<b>7,235,500</b>
<b>SECTION 8:</b>						
Vouch&MR		15,657,900		2,500		15,660,400
Agency Fund				10,000	22,000	32,000
		<b>15,657,900</b>		<b>12,500</b>	<b>22,000</b>	<b>15,692,400</b>
<b>TOTALS</b>	<b>872,300</b>	<b>25,195,000</b>	<b>3,267,400</b>	<b>78,700</b>	<b>1,011,200</b>	<b>30,424,600</b>

**3. Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.**

From the Section 8 Admin Plan:

**OVERVIEW OF RENT AND SUBSIDY CALCULATIONS**

**TTP Formula [24 CFR 5.628]**

HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:

1. 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
2. 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
3. The welfare rent (in as-paid states only)
4. A minimum rent between \$0 and \$50 that is established by the PHA

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B.

The amount that a family pays for rent and utilities (the family share) will never be less than the family's TTP but may be greater than the TTP depending on the rent charged for the unit the family selects.

***Minimum Rent [24 CFR 5.630]***

PHA Policy

The minimum rent for this locality is \$0.

**Family Share [24 CFR 982.305(a)(5)]**

If a family chooses a unit with a gross rent (rent to owner plus an allowance for tenant-paid utilities) that exceeds the PHA's applicable payment standard: (1) the family will pay more than the TTP, and (2) at initial occupancy the PHA may not approve the tenancy if it would require the family share to exceed 40 percent of the family's monthly adjusted income. The income used for this determination must have been verified no earlier than 60 days before the family's voucher was issued. (For a discussion of the application of payment standards, see section 6-III.C.)

HUD also requires PHAs to determine that units rented by families assisted under the HCV program have rents that are reasonable when compared to comparable unassisted units in the market area.

No HAP contract can be approved until the PHA has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also

requires that owners not charge more for assisted units than for comparable units on the premises. This part explains the method used to determine whether a unit's rent is reasonable.

From the Public Housing Statement of Policy:

Computation of Total Tenant Payment (for Public and Assisted Housing)

1. Total Tenant Payment shall be the highest of the following (rounded to the nearest dollar):
  - a. Thirty percent (30%) of monthly income after allowances;
  - b. Ten percent (10%) of gross monthly income;
  - c. \$0.00 Minimum TTP for Public Housing;
  - d. \$25.00 for Section 8 units at Abbie Lane, Fourteen Pines and Village Oaks.

Public Housing Flat Rents are reviewed annually and are based on comparisons of our units size, location, age, general conditions, and amenities compared with 'like kind' in the private sector. Using local property management companies and newspaper ads, we are able to generate average rents based on these best fit unit to unit comparisons

4. **Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.**

The Agency has in place a Statement of Policy, House Rules, Maintenance Plan, Integrated Pest Management, and Energy Plan. The Integrated Pest Management Plan outlines the Agency's plan for pest management which includes measures necessary for the prevention of pest and eradication services for residents experiencing an infestation.

5. **Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.**

From the Public Housing Statement of Policy:

**APPEAL PROCESS FOR APPLICANTS**

**SECTION I.**

Procedures for resolving grievances for cancellation of applications.

## **GROUNDINGS FOR CANCELLATION OF APPLICATION**

HACSA may cancel an application of the Applicant for any of the following reasons:

- A. Failure to respond to HACSA's correspondence, letters, or documentation inquiries by a specified date.
- B. Failure to submit all necessary verifications and documentation to HACSA inquiries by a specified deadline as noted in the correspondence.
- C. Failure to attend scheduled HACSA briefings, orientations, and appointments.
- D. Failure to provide complete and accurate information as requested to determine eligibility.
- E. If correspondence is mailed to the Applicant's last known address, and is returned by the Post Office marked "undeliverable" or "moved left no forwarding address."
- F. Refusal of a unit offer without "good cause" (in accordance with Section VII.E.-G.).

If an Application is canceled, the Applicant will be informed of the right to request an Informal Review of the decision. The Applicant's request for the Informal Review shall be in writing, addressed to the Occupancy Supervisor, HACSA, 300 West Fairview, Springfield, Oregon 97477 and received by HACSA within 14 days after the date of the Notice of Application Cancellation. The Request for Informal Review should contain any extenuating circumstances or evidence the Applicant wishes the reviewer to know prior to the review of the canceled file.

After reviewing the Applicant's request and HACSA's canceled file, a decision will be made regarding the cancellation.

A written notification of the decision of the Informal Review will be sent to the Applicant and a copy of the determination will be placed in HACSA's Applicant's file. If the decision is made to reinstate the Applicant, the Applicant will be returned to the waiting list, with the original time and date of application.

If the decision is made that the Applicant's application was canceled, the decision will be final.

## **SECTION II.**

Procedures for Resolving Applicant Eligibility Grievances for Housing Division Programs.

For a current list of complexes covered by these procedures, see the Statement of Policies. Complexes may be added or deleted from this procedure in the future.

### **A. GROUNDINGS FOR INELIGIBILITY DETERMINATION**

In general, HACSA may deny an Applicant admission/participation in a program in the following cases:

- a. If the Applicant currently owes rent or other monies to HACSA, or to another housing authority in connection with Section 8, Public Housing, or other housing assistance programs under the US Housing Act of 1937 as amended.
- b. If the Applicant (as a previous participant in the Section 8 Program) has not reimbursed HACSA or another HA amounts paid to an owner under a Contract for rent or other amounts owed by the family under the Lease.

- c. If the Applicant has committed fraud in connection with any federal housing assistance program.
- d. If the Applicant or any member of Applicant's family has engaged in drug related criminal activity or violent criminal activity as defined in HACSA's Statement of Policies and in 24 CFR 966.
- e. If the Applicant fails to meet any of the eligibility requirements or selection standards for admission set out in HACSA's Statement of Policies.
- f. If the Applicant has breached an agreement to pay amounts owed to HACSA or amounts paid to an owner by HACSA on their behalf.
- g. If the Applicant fails to meet the Social Security Number disclosure requirements.
- h. If the Applicant fails to provide documentation for verification of citizenship or eligible immigration status.
- i. If the Applicant has been listed on HUD's List of Suspensions, Debarment, and Limited Denials of Participation.
- j. HACSA may review the criminal history and/or court records for all members of an Applicant family. Applicants may be asked to submit fingerprints for State or NCIC records check. Applicants with a record of criminal activity, drug related criminal activity or any other crimes that would pose a threat to property or to the life, health, safety or peaceful enjoyment of Residents, neighbors or HACSA staff may be denied assistance. Drug related criminal activity includes, but is not limited to: the illegal manufacture, sale, distribution, use or possession of a controlled substance and the illegal possession of a controlled substance with the intent to use, manufacture, sell or distribute the substance.  
**HACSA has a zero-tolerance policy for all drug-related activity.** HACSA may deny admission to an Applicant if any household member is currently using an illegal controlled substance or if HACSA has reasonable cause to believe that the Applicant's (or other household member's) use or pattern/history of illegal use, of a controlled substance may interfere with the health, safety or right to peaceful enjoyment by other Residents. HACSA may also deny admission to an Applicant if they or any other household member abuse alcohol or has a history or pattern of alcohol abuse that HACSA has reasonable cause to believe may interfere with the health, safety or right to peaceful enjoyment by other Residents.

HACSA may deny admission to any Applicant family with a criminal record of an arrest, charge or conviction for the manufacture, sale, or distribution of a controlled substance, or possession with intent to manufacture, distribute or sell a controlled substance.

In determining whether to deny housing assistance based on drug-related criminal activity or criminal activity:

- 1. HACSA may deny assistance if the preponderance of evidence indicates that an Applicant and/or a family member has engaged in such activity, regardless of whether the family member has been arrested or convicted;
- 2. HACSA shall have discretion to consider all of the circumstances in each case, including, but not limited to, the seriousness of the offense, the extent of participation by family members, and the effects that denial



would have on family members not involved in the activity. HACSA, in appropriate cases, may impose a condition that family members determined to have engaged in the activities may not reside in the unit. HACSA may require an Applicant and/or a family member that has engaged in drug-related activity to submit evidence of successful completion of a treatment program and a reasonable recovery period as a condition of being allowed to reside in the unit.

- k. If the Applicant has provided false information on their application and/or other forms.

## **B. NOTIFICATION OF INELIGIBLE STATUS**

1. If HACSA makes a determination that the individual is ineligible for assistance, HACSA shall promptly notify that individual or family by letter consistent with the Statement of Policies. A copy of the notification of the ineligibility determination and the Applicant's right to an Informal Hearing shall be sent to one or more of the following HACSA employees:
  - a. Program Supervisor.
  - b. Applications Specialist: an employee who may make the initial determination of the eligibility of Applicants.
  - c. Intake Coordinator: an employee who may make the initial determination of the eligibility of Applicants.
  - d. Designated Hearings Officer.
2. The ineligibility notification shall include the following information:
  - a. The specific facts and the reasons for the ineligibility determination.
  - b. Information regarding how the applicant may contest the ineligibility determination before it becomes final, by requesting, either verbally or in writing, an Informal Hearing within fourteen (14) calendar days after receiving the written notice of ineligibility.
  - c. The name, address and telephone number of the person to be contacted if the Applicant requests an Informal Hearing.
  - d. A clause informing the Applicant that he/she has the option of obtaining and being represented by legal counsel or other representative at their own expense. HACSA does not provide legal counsel to the Applicant.
  - e. A clause informing the individual that he/she will have the right at the Informal Hearing to ask questions of the individuals regarding the information which has led to the ineligibility determination.
  - f. A clause indicating that the Applicant has the right to present evidence that would affect the final eligibility determination.
  - g. A clause indicating that if the Applicant is disabled and believes that the determination is a result of his/her disability, a request for Reasonable Accommodation may be made.
  - h. A clause indicating that the Applicant shall have the right to copy any documents

and/or regulations of HACSA prior to the Informal Hearing. The clause shall also state that the Applicant may be charged a \$5.00 basic charge plus \$.05 per copy.

**C. THE INFORMAL HEARING**

1. The Applicant has the right to request an Informal Hearing on HACSA's decision regarding the Applicant's ineligibility for participation in the programs covered by this process, which is limited as follows:
  - a. HACSA shall give an Applicant prompt written notice of a decision denying eligibility to the Applicant, including a decision denying listing on the waiting list, participation in a Program, or a determination of ineligibility. The notice shall contain a brief statement of the reasons for the decision. The notice shall also state that the Applicant may request an Informal Hearing on the decision, and shall describe how to obtain the Informal Hearing. See Section B above for additional information regarding the notification of ineligibility.
  - b. HACSA shall give the Applicant an opportunity for an Informal Hearing on the adverse decision. However, HACSA is not required to provide an opportunity for an Informal Hearing in the following circumstances:
    - i. To review discretionary administrative determinations by HACSA, or to consider general policy issues or class grievances;
    - ii. To review HACSA's determination of the number of bedrooms to which the Applicant is entitled under the standards established by HACSA;
    - iii. To review HACSA's determination as to whether good cause or undue hardship exists in the case of Applicant's refusal of a unit;
    - iv. To review HACSA's determination that the Applicant is ineligible due to owing HACSA money (or any other Federal housing program money), when notification of the opportunity for an Informal Hearing was sent to the family at their last known address at the time the money owing amount was determined, and they did not request an Informal Hearing at that time.
    - v. To review HACSA's determination of ineligibility for HACSA's Scattered Site Incentive Transfer Program.

**D. REQUEST FOR INFORMAL HEARING**

If an Informal Hearing is requested, HACSA shall schedule it on a date mutually agreed upon by the relevant parties. HACSA shall notify the Applicant of the time, date and place of the Informal Hearing. If the Applicant has a good reason for not being able to attend the Informal Hearing on the particular time or date set by the notice, the Applicant must inform the designated Hearings Officer prior to the time or date set, and a mutually-convenient time, as soon as practically possible, will then be scheduled, depending on the reason(s) for the postponement.

The Informal Hearing may be conducted by phone or conference call if the family is unable to come to HACSA for the Hearing.

A request for an Informal Hearing must be made by the Applicant within fourteen (14) calendar days of the ineligibility notification. A request for an Informal Hearing is to be directed to the person named in the ineligibility notification.

If the Applicant does not request an Informal Hearing within the fourteen (14) calendar day limitation, the determination of ineligibility becomes final without further notice to the Applicant.

If the Applicant fails to appear for an Informal Hearing without good cause or without prior notification, the determination of ineligibility will become final.

#### **E. CONDUCT OF INFORMAL HEARING**

The purpose of an Informal Hearing is to come to a final decision on eligibility to receive housing assistance/admission to the programs covered by this procedure.

The Informal Hearing will be conducted by a staff person who is not subordinate to anyone who made the initial determination of eligibility; nor will the staff person have previously participated in the review or initial determination of eligibility status. If a conflict does exist, HACSA shall designate another individual to conduct the Informal Hearing.

This is NOT a judicial hearing; thus no order of proof or mode of offering of evidence needs to be adhered to. How the Informal Hearing is to be run is strictly within the discretion of the Hearings Officer or the person who substitutes for that individual. However, it shall be the responsibility of the Hearings Officer to ensure that adequate information is brought out at the Informal Hearing so that a reasonable decision may be made concerning the final eligibility of the Applicant.

#### **F. DECISION**

1. The decision on eligibility shall be made by the Hearings Officer and shall be a final determination of the Applicant's eligibility. That decision shall be made consistent with this procedure. The Hearings Officer shall inform the parties in writing of his/her decision regarding the eligibility of the Applicant. The Hearings Officer shall state the reasons for the determination and indicate the evidence that was relied upon. Factual determinations relating to individual circumstances of the Applicant shall be based on a preponderance of the evidence presented at the Informal Hearing. The Hearings Officer may solicit additional information or documentation obtained outside of the Informal Hearing. The decision shall be in writing and shall be sent to the Applicant within five (5) days for Assisted Housing Applicants and within 14 days for Public Housing Applicants after the conclusion of the Informal Hearing and/or the completion of any additional fact-finding on the part of the Hearings Officer. Signature of the Applicant that he/she has received the decision in person is an acceptable alternative to mail delivery.
2. HACSA is not bound by the decision of the Hearings Officer if the Hearings Officer's decision:
  - a. Concerns a matter for which HACSA is not required to provide an opportunity for an Informal Hearing in accordance with Section II.C.b. of these Procedures, or
  - b. Concerns a matter for which the Hearings Officer has exceeded his/her authority for conducting the Informal Hearing under these procedures, or
  - c. When the decision is contrary to HUD regulations or requirements, or is

otherwise contrary to federal, state or local law.

If HACSA determines that it is not bound by a decision, HACSA shall promptly notify the participant of the determination and of the reasons for the determination.

3. Hearings Officer Decision

- a. If the decision is in favor of the Applicant, he or she would be deemed eligible to receive assistance. If, such assistance is not available at the time of the decision, the Applicant will be returned to the waiting list with their original time and date of application.
- b. If the decision is that the Applicant is ineligible to receive assistance, the Applicant shall be denied participation in the housing assistance program and the application will be canceled.

**GRIEVANCE PROCEDURES FOR RESIDENTS**

**SECTION I. PURPOSE AND EXCLUSIONS.**

A. **PURPOSE.** The HOUSING AND COMMUNITY SERVICES AGENCY OF LANE COUNTY (herein "HACSA") has adopted the following rules:

1. To establish grievance procedures for review of complaints by individual Residents about adverse actions initiated by HACSA.
2. To guarantee Residents the right to a fair and impartial hearing on any grievance. "Residents" include "Residents at any and all complexes/projects owned and managed by HACSA." For a current list of complexes covered by these procedures see the current Statement of Policies. Additions or deletions to the list of covered complexes may be made in the future.

B. **EXCLUSIONS.** These grievance procedures do not apply to:

1. Any attempt to initiate or negotiate HACSA policy changes.
2. Any complaint from a participant in the Section 8 Housing Assistance Payment Certificate and Voucher Program or Mod Rehab Program.
3. Any dispute between Residents which does not involve their rental agreement or any HACSA regulation.
4. Eviction for any action or inaction of a Resident, or someone in the Resident's control, that endangers the health or safety or right to peaceful enjoyment of the premises, of HACSA employees, neighbors or other Residents. Any Resident or someone in the Resident's control who commits any act outrageous in the extreme.
5. Eviction for any action or inaction of the Resident involving drug-related criminal activity on or off any public housing premises (Housing Opportunity Program Extender, Act of 1996) or drug-related criminal activity on or near non-public housing premises owned or managed by HACSA.

6. Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises or other Residents or HACSA employees. (24 CFR 966.51(2)(i)(A).) Residents grieving the types of activities listed in this section of the CFR may be excluded from all grievance proceedings or from the right to request a Formal Hearing. They may be offered, at HACSA's discretion, the opportunity to request an Informal Settlement Discussion (ISD).
7. Ineligibility determinations of a Resident applying for the Scattered Site Incentive Transfer Program.

C. GRIEVANCE PROCEDURE

HACSA shall adopt a grievance procedure affording each Resident an opportunity for a Hearing on a grievance in accordance with the requirements, standards, and criteria contained in this procedure. The grievance procedure shall be included in, or incorporated by reference in, all Resident leases. HACSA shall provide at least 30 days notice to Residents and Resident organizations setting forth proposed changes in the grievance procedure, and providing an opportunity to present written comments. Subject to the requirements of HUD, comments submitted shall be considered by HACSA before adoption of any grievance procedure changes by HACSA.

- D. DISCRIMINATION - BASED UPON DISABILITY. Any Resident in HACSA's Public Housing or other programs covered by this procedure who believes s/he has been discriminated against because of a disability may file an internal grievance with HACSA on the basis of disability, or he/she may file a complaint with a government agency or they may do both. A grievance may be filed against any person alleged to be engaged, or to have been engaged, on or about to engage in a discriminatory housing practice as prohibited in Section 504 of the Rehabilitation Act of 1973, as amended or the Fair Housing Act.

Due process standards will provide for the prompt and equitable resolution of the grievances alleging any action prohibited under Section 504 of the Fair Housing Act.

The current Section 504 Coordinator who will assist persons in filing the grievance is Chuck Hauk, 504/ADA Coordinator. His telephone number is (541) 682-2585. Complaints of discrimination may be filed with the U.S. Department of Housing and Urban Development at the following address; Intake Unit, U.S. Department of Housing and Urban Development, Northwest/Alaska Area Office, Office of Fair Housing and Equal Opportunity, 909 First Avenue, Suite 205, Seattle, Washington 98104-1000. The telephone number is (206) 220-5170 and the toll free number is 1-800-424-9590. The TDD phone number is (206) 220-5185.

The procedures do not apply to disputes between Residents not involving HACSA nor is it to be used as a forum for initiating or negotiating policy changes between a group or groups of Residents and HACSA's Board of Commissioners.

**SECTION II. DEFINITIONS.**

- A. RESIDENT. "Resident" means any Resident of a dwelling unit owned by, or managed by HACSA, who presents a grievance to HACSA. Resident shall further mean the person(s) who resides in the unit and who executed the lease with HACSA as lessee of the unit or who resides in the unit and is the remaining head of household of the Resident family residing in the dwelling. For the purposes of this document, the term Tenant shall be interchangeable with the term "Resident" as used in HACSA's documents, policies and procedures.

- B. GRIEVANCE. "Grievance" means any dispute a Resident may have with HACSA'S action or inaction adversely affecting the rights, duties, welfare or status under the rental agreement or HACSA regulations. (See, Section 1.)
- C. HEARINGS OFFICER. "Hearings Officer" means any person selected to hear grievances and render a decision or facilitate discussions.
- D. INFORMAL SETTLEMENT DISCUSSION (ISD). A Resident may request an Informal Settlement Discussion if they have a grievance as outlined in Section I. The ISD offers the Resident the opportunity to discuss the grievance, present evidence and information, and to try and resolve the issue(s). If a Resident is dissatisfied with the decision made during the ISD, the Resident has the right to request a Formal Hearing. Non-Public Housing Residents (Abbie Lane, Village Oaks & Fourteen Pines) are not entitled to a Formal Hearing.  
  
The Informal Settlement Discussion may be held in the project complex nearest the Resident's dwelling unit, or, at HACSA's office, located at 300 W. Fairview, Springfield, Oregon. If the Resident fails to request an ISD within the required time frame and can show the Hearings Officer that he/she had "Good Cause" for not complying, the Hearings Officer may proceed to a Formal Hearing or schedule an ISD.
- E. RENT. "Rent" means the monthly amount due under the Resident's Lease Agreement for the use and occupancy of the dwelling unit, except any amount required as a security deposit, for utilities, maintenance and repair or other charges.
- F. DRUG-RELATED CRIMINAL ACTIVITY. "Drug-Related Criminal Activity" includes, but is not limited to, the illegal manufacture, sale, distribution, use or possession of a controlled substance and illegal possession of a controlled substance with the intent to use, manufacture, sell or distribute.
- G. OUTRAGEOUS IN THE EXTREME. "Outrageous in the Extreme" includes, but is not limited to: any crime that involves firearms, violence or drugs, intimidation of HACSA staff or other Residents, any attempts, intent or threats to use a dangerous weapon, or any drug-related or criminal activity. Additional acts outrageous in the extreme may include, but are not limited to: a Resident who endangers or threatens to endanger the health or safety of HACSA staff, another Resident or other person on the premises; or threatens or inflicts substantial damage to any property of HACSA; another Resident or other person upon the premises.

### **SECTION III. DUE PROCESS GUARANTEES**

HUD has issued a due process determination for the State of Oregon, which means the (FED) Forcible Entry & Detainer Court process in Oregon contains the basic elements of due process and which allows HACSA to exclude from their grievance procedures some types of evictions.

The parties using these procedures shall be guaranteed the following basic safeguards of procedural due process:

- A. The opportunity to reply, examine, and/or copy before the Informal Settlement Discussion or Formal Hearing, at the expense of the Resident, all documents, records and regulations of HACSA that are relevant to the Resident's grievance. HACSA shall charge a \$5.00 basic charge and \$.05 per copy for any request for copies.
- B. The right to be represented by counsel or other person chosen as the party's

representative. The Resident shall be responsible for these arrangements.

- C. The right to a private Hearing unless the Resident requests a public Hearing.
- D. The right to present evidence and arguments in support of their position, to dispute evidence relied on by the other party, and to confront and cross examine witnesses.
- E. The right to request Reasonable Accommodations for conducting the Informal Settlement Discussion(s) or Formal Hearing(s) based on a disability by the Resident or their representative.
- F. In the case of Informal Settlement Discussions (ISD), the decision will be based on information provided at the discussion as well as additional information obtained by the person conducting the discussion, which may occur outside of the discussion.
- G. In the case of Formal Hearings, the decision shall be based solely on the facts presented at the Hearing and as reviewed and researched by the Hearings Officer in preparing the decision.

#### **SECTION IV. GENDER AND NUMBER.**

As used in these procedures the term gender shall include the feminine, masculine, he/she, her/his, they/them, or any form thereof. Number shall mean: one (singular) or more (plural).

#### **SECTION V. SECTION HEADINGS AND CAPTIONS.**

The headings of particular sections or paragraphs are inserted for convenience only and are not a part of these grievance procedures or a limitation of the scope of the particular section or paragraph to which they refer.

#### **SECTION VI. WAIVER OF RIGHTS.**

Failure of the Resident to comply with any provision of these rules will not be interpreted as a waiver by the Resident of his/her rights to contest any HACSA action or inaction in an appropriate judicial proceeding.

#### **SECTION VII. GIVING OF NOTICE.**

##### **A. NOTICE TO THE RESIDENT.**

All notices, summaries of decisions, written decisions or any other written material that these procedures require to be given to the Resident shall be delivered by first class mail, faxed, hand delivered to the Resident or to an adult member of the Resident's family at his/her place of residence, or posted securely to the door of the residence and a copy mailed by first class mail.

##### **B. NOTICE TO HACSA.**

All requests for informal or (ISD) settlements, may be presented orally, by fax or in writing by first class mail to the Housing Division office located at 300 W. Fairview, Springfield, Oregon 97477. Formal Hearing requests must be in writing or by fax to the Housing Division office.

#### **SECTION VIII. OTHER REMEDIES AVAILABLE TO RESIDENTS.**

These procedures do not prohibit or affect any person's other options and remedies if they believe

they are being discriminated against because of their age, race, color, physical or mental disability, sex, national origin, religion, or familial status.

## **SECTION IX. PROCEDURES FOR INFORMAL SETTLEMENT DISCUSSIONS & FORMAL HEARINGS**

### **A. INFORMAL RESOLUTION OF GRIEVANCES.**

Residents are encouraged to informally resolve grievances/disputes with staff. The Resident may request to meet informally with staff or request a supervisor conduct a file review to resolve the issues.

### **B. INFORMAL SETTLEMENT DISCUSSION PROCEDURE (ISD).**

#### **1. SELECTION OF THE HEARINGS OFFICER FOR INFORMAL SETTLEMENT DISCUSSION.**

- a. The ISD shall be conducted before The ISD shall be conducted before a Hearings Officer. The Hearings Officer shall be an impartial, disinterested person, appointed by HACSA, other than a person who made or approved HACSA's action under review or a subordinate of such a person. This person may be a HACSA employee.
- b. HACSA will provide reimbursement for reasonable out-of pocket expenses incurred by the Hearings Officer directly related to his/her attendance at the ISD.

#### **2. PRESENTATION OF THE GRIEVANCE.**

- a. All grievances must be presented in person, orally, by fax, or in writing to the designated Hearings Officer or his/her delegate and, if possible, settled informally without an Informal Settlement Discussion. The discussion may be held in the complex office nearest the Resident's dwelling unit, or at HACSA's office located at 300 W. Fairview, Springfield, Oregon.
- b. Listed below are the timeframes to which a Resident must adhere\* when requesting an Informal Settlement Discussion (ISD) after receipt of the notice:

TYPE OF GRIEVANCE	Number of Days
Public Housing Resident- Non-Payment of Rent Notice	5 Working Days *
Non-Public Housing Resident Non-Payment of Rent Notice	3 Calendar Days *
Public Housing Resident - Other Types of Evictions	5 Working Days *
Non-Public Housing Resident Other Types of Evictions	10 Calendar Days*
Other Types of Grievances	14 Calendar Days After Incident or Action



\*All notices will be considered received three days after mailing or on the date the notice is either hand delivered or posted securely on the entrance to the residence and a copy mailed by first class mail.

3. GRIEVANCES INVOLVING RENT:

- a. If a Resident disagrees with HACSA's rent calculations or retro-active rent determinations, the Resident must continue to pay at least the amount of rent figured at the last recertification until the Informal Settlement Discussion or Formal Hearing decision has been rendered.
- b. If a Resident is currently receiving a utility reimbursement, HACSA will continue to reimburse the Resident until the ISD or Formal Hearing decision has been rendered.

4. INITIAL DISPOSITION OF THE GRIEVANCE.

- a. A summary of the ISD will be prepared by the Hearings Officer or his/her delegate within five (5) working days from the date of the discussion. The summary shall include:
  - i. The names of the participants present during the discussion;
  - ii. The date of the discussion;
  - iii. The nature of each grievance;
  - iv. Its disposition; and
  - v. If the disposition is adverse to the Resident, the reasons for the disposition.
- b. One copy of the summary will be mailed or delivered, according to the method specified herein, to the Resident within five (5) working days from the date of the discussion, and another copy will be retained in HACSA's Resident file. If it is so requested, a copy will also be mailed and/or faxed to either party's representative.
- c. The Resident shall also be informed of his/her right to a Formal Hearing if he/she is dissatisfied with the disposition of the grievance. Information regarding the procedures for requesting a Formal Hearing will be mailed or delivered to the Resident with the summary of discussion. Non-Public Housing Residents do not have the right to request a Formal Hearing with HACSA.

C. PROCEDURE IF NO INFORMAL SETTLEMENT - FORMAL HEARING.

- 1. FAILURE TO REQUEST A FORMAL HEARING. If the Resident does not request a Formal Hearing within the time established in these procedures, then HACSA's disposition of the grievance shall be final. (See Section IX.B.2.b. for exceptions.)
- 2. ISD PREREQUISITE.
  - a. The Resident and HACSA must comply with the Informal Settlement procedure in Section IX.B before a Formal Hearing will be scheduled.

- b. If the Resident fails to comply with the Informal Settlement procedure, he/she may petition the Hearings Officer for an Informal Review on the issue of whether the Resident had good cause for not complying.

If the Hearings Officer determines the Resident did not have good cause, the proceedings shall terminate. If the Hearings Officer determines (s) he had good cause, the Hearings Officer may reschedule an ISD or proceed to a Formal Hearing.

- 3. REQUEST FOR FORMAL HEARING. If the Resident is dissatisfied with the disposition of the grievance after the ISD, he/she may submit a written Request for a Formal Hearing to HACSA's office located at 300 W. Fairview, Springfield, Oregon, within five (5) working days after receipt of the Summary of ISD. The Request for a Hearing may be served upon HACSA according to the method specified in these procedures. The request should include:

- a. The parties involved in the grievance;
- b. The HACSA action or inaction complained of;
- c. The date, or dates, of action or inaction;
- d. The reasons for the grievance; and
- e. The action or relief sought.

- 4. FORMAL HEARINGS REGARDING RENT.

- a. AMOUNT OF RENT. Before a Formal Hearing will be scheduled on any grievance involving the amount of rent HACSA claims to be due, including retro-active rent, the Resident must pay HACSA all unpaid rent which has accrued to date. If the amount of unpaid rent is disputed, it shall be determined by HACSA according to the following formula: Unpaid rent equals the amount of monthly rent due at the last income recertification, multiplied by the number of months (or parts thereof) of occupancy during which no rent or partial rent has been paid. Unpaid rent includes rent due for the month in which the grievance is presented. The Resident must continue to pay additional rent which becomes due after the grievance is presented and before it is resolved.
- b. DISPOSITION OF RENT DEPOSIT. HACSA shall hold any amount of rent deposited pending the outcome of the Formal Hearing. The Hearings Officer shall determine the amount due by each party. The party to whom a net amount is owed shall be paid first from the money deposited, and shall also be paid the balance by the other party within fourteen (14) days after receipt of the Hearings Officer's decision. The rent deposit, or any part thereof, may be released at any time if the parties agree or if the Hearings Officer so orders.

If HACSA owes money to the Resident, the Resident may choose to leave the credit balance on their account.

- c. WAIVER OF DEPOSIT. If extenuating circumstances exist, the requirement for a rent deposit may be waived by the Hearings Officer.

- d. FAILURE TO MAKE DEPOSIT. Unless waived, the failure to make the required payments of the rent deposit will result in termination of the proceedings.
- 5. SCHEDULING OF THE HEARING. Upon the Resident's compliance with Section IX.B, and IX.C., a Formal Hearing will be scheduled by HACSA for a time and place reasonably convenient to both parties. HACSA will attempt to schedule the Formal Hearing within fourteen (14) days of receipt of the Request for Formal Hearing. A written notification of the date, time, and place will be delivered to the Resident and the representative of either party, in accordance with the method(s) specified in these procedures for the giving of notice.
- 6. SELECTION OF THE FORMAL HEARINGS OFFICER.
  - a. Formal Hearings shall be conducted before a Hearings Officer. The Hearings Officer shall be an impartial, disinterested person, appointed by HACSA.
  - b. HACSA shall consult with Resident(s) and/or Resident organizations(s) in the appointment of Hearings Officers. Any comments or recommendations submitted by a Resident and/or Resident organization(s) shall be considered by HACSA before the final appointment of the Hearings Officer.
  - c. HACSA will provide reimbursement for reasonable out-of-pocket expenses incurred by the Hearings Officer directly related to his attendance at the Formal Hearing.

D. PROCEDURES GOVERNING THE FORMAL HEARING.

- 1. PRE-HEARING DECISION. The Hearings Officer may render a decision without proceeding with the Formal Hearing if it is determined that the issue has been previously decided in another proceeding.
- 2. FAILURE TO APPEAR. If either the Resident or HACSA fails to appear at a scheduled Hearing, the Hearings Officer may decide with good cause to postpone the Hearing for no more than five (5) working days, or may decide that the party has waived their right to a Hearing. All parties shall be notified, in writing, of the decision according to the method specified herein for the giving of notice.
- 3. CONDUCT OF THE HEARING.
  - a. The Hearing shall be conducted informally by the Hearings Officer. Oral or documentary evidence relevant to the facts and issues raised may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings.
  - b. The Hearings Officer shall require HACSA, the Resident, representatives, counsel and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the Hearings Officer may result in exclusion from the proceedings or in a decision adverse to the interest of the disorderly party.
- 4. BURDEN OF PROOF. At the Hearing, the Resident must first make a showing of

entitlement to the relief sought. HACSA must then justify its action or inaction. However, when the Resident is contesting a proposed eviction, HACSA must establish by the preponderance of evidence, the violation(s) of the rental agreement warranting termination of the lease and then the Resident must justify his/her action or inaction as not violating the terms of his/her rental agreement.

5. The Resident or HACSA may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the Hearing. Either party may purchase a copy of that transcript.
6. HACSA shall make Reasonable Accommodations for persons with disabilities to participate in the Hearing. Reasonable Accommodations may include, but are not limited to, sign language interpreters, readers, accessible locations, or attendants. If the Resident is visually impaired, any notice to the Resident which is required under this grievance procedure may be made available in an accessible format.

E. DECISION OF THE FORMAL HEARING OFFICER.

1. WRITTEN DECISION. The Hearings Officer will prepare a written decision including findings and conclusions together with reasons therefore on each material issue raised by the parties. The decision will be prepared within five (5) working days from the date of the Hearing. A copy of the decision will be delivered to the Resident, HACSA, and representatives, in accordance with methods specified herein for Giving of Notice. To expedite the decision, the Hearings Officer may fax a copy of the decision to the parties or their representatives. HACSA shall retain a copy of the decision in HACSA's Resident file.
2. FILE OF DECISIONS. A copy of all Formal Hearing decisions with all the names and identifying references deleted will also be kept on file by HACSA for three years. Any prospective Resident, his/her representative, or a Hearings Officer may have access to the file of decisions.
3. EFFECT OF DECISION. The decision of the Hearings Officer is binding on HACSA. HACSA shall take all action, or refrain from any action, necessary to carry out the decision. However, the decision is not binding if the Executive Director determines within thirty (30) days, and promptly notifies the Resident of his determination, that:
  - a. The grievance does not concern HACSA action or inaction adversely affecting the Resident's rights, duties, welfare or status stemming from the Resident's rental agreement or HACSA regulations; or
  - b. The decision of the Hearings Officer is contrary to federal, state or local law, HUD regulations or requirements of the Annual Contributions Contract between HUD and HACSA.
4. REHEARING. After notification of the Executive Director's determination, the Resident may petition the Executive Director for a rehearing of the grievance. If the Executive Director reaffirms her/his determination reversing the decision of the Hearings Officer, the Resident may seek judicial review. If the Executive Director grants a Hearing, it will take place in accordance with HACSA's Grievance Procedures for Residents.

F. TERMINATION OF TENANCY.

1. HEARING REQUESTED. If a Resident has requested a Hearing under these grievance procedures regarding a Notice of Termination of Tenancy (eviction notice), HACSA shall take no action on the termination until the Hearings Officer renders a decision.
2. NOTICE TO VACATE. If the Hearings Officer upholds HACSA's decision to terminate the tenancy, HACSA shall not commence an eviction action in court until it has served a Notice to Vacate on the Resident. The Notice to Vacate will not be issued until the decision of the Hearings Officer has been delivered to the Resident and his/her representative according to the method specified herein for Giving of Notice.
3. EVICTIION. The Notice to Vacate must be in writing and must state that if the Resident fails to vacate the premises within the time specified after receipt of the notice, or on the termination date stated in the Notice of Termination, whichever is later, appropriate legal action may be taken against the Resident and he/she may be liable for court costs and attorneys fees.

From the Section 8 Admin Plan:

### PART III: INFORMAL REVIEWS AND HEARINGS

#### 16-III.A. OVERVIEW

When the PHA makes a decision that has a negative impact on a family, the family is often entitled to appeal the decision. For applicants, the appeal takes the form of an informal review; for participants, or for applicants denied admission because of citizenship issues, the appeal takes the form of an informal hearing.

PHAs are required to include in their administrative plans, informal review procedures for applicants, and informal hearing procedures for participants [24 CFR 982.54(d)(12) and (13)].

#### 16-III.B. INFORMAL REVIEWS

Informal reviews are provided for program applicants. An applicant is someone who has applied for admission to the program, but is not yet a participant in the program. Informal reviews are intended to provide a "minimum hearing requirement" [24 CFR 982.554], and need not be as elaborate as the informal hearing requirements. (Federal Register Volume 60, No. 127, p 36490).

##### Decisions Subject to Informal Review

The PHA must give an applicant the opportunity for an informal review of a decision denying assistance [24 CFR 982.554(a)]. Denial of assistance may include any or all of the following [24 CFR 982.552(a)(2)]:

- I. Denying listing on the PHA waiting list
- II. Denying or withdrawing a voucher
- III. Refusing to enter into a HAP contract or approve a lease
- IV. Refusing to process or provide assistance under portability procedures
- V. Denial of assistance based on an unfavorable history that may be the result of domestic violence, dating violence or stalking. (See Section 3-III.G.)

Informal reviews are not required for the following reasons [24 CFR 982.554(c)]:

- VI. Discretionary administrative determinations by the PHA

- VII. General policy issues or class grievances
- VIII. A determination of the family unit size under the PHA subsidy standards
- IX. A PHA determination not to grant approval of the tenancy
- X. A PHA determination that the unit is not in compliance with the HQS
- XI. A PHA determination that the unit is not in accordance with the HQS due to family size or composition

#### PHA Policy

The PHA will only offer an informal review to applicants for whom assistance is being denied. Denial of assistance includes: denying listing on the PHA waiting list; denying or withdrawing a voucher; refusing to enter into a HAP contract or approve a lease; refusing to process or provide assistance under portability procedures.

#### Notice to the Applicant [24 CFR 982.554(a)]

The PHA must give an applicant prompt notice of a decision denying assistance. The notice must contain a brief statement of the reasons for the PHA decision, and must also state that the applicant may request an informal review of the decision. The notice must describe how to obtain the informal review.

#### Scheduling an Informal Review

##### PHA Policy

A request for an informal review may be made in writing or verbally and received by the PHA no later than 14 days from the date of the PHA's denial of assistance.

Except as provided in Section 3-III.G, the PHA must schedule and send written notice of the informal review within 14 days of the family's request.

#### Informal Review Procedures [24 CFR 982.554(b)]

##### PHA Policy

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant must be provided an opportunity to present written or oral objections to the decision of the PHA.

The Review may be conducted by:

A staff person who is at the supervisor level or above.

The family may use an attorney or other representative to assist them at their own expense.

The review may be conducted by mail and/or telephone if acceptable to both parties.

The person conducting the review will make a recommendation to the PHA, but the PHA is responsible for making the final decision as to whether assistance should be granted or denied.

#### Informal Review Decision [24 CFR 982.554(b)]

The PHA must notify the applicant of the PHA's final decision, including a brief statement of the reasons for the final decision.

##### PHA Policy

In rendering a decision, the PHA will evaluate the following matters:

Whether or not the grounds for denial were stated factually in the Notice.

The validity of the evidence. The PHA will evaluate whether the facts presented prove the grounds for denial of assistance. If the facts prove that there are grounds for denial, and the denial is required by HUD, the PHA will uphold the decision to deny assistance.

If the facts prove the grounds for denial, and the denial is discretionary, the PHA will consider the recommendation of the person conducting the informal review in making the final decision whether to deny assistance.

The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 10 business days of the informal review, to the applicant and his or her representative, if any, along with proof of mailing.

If the decision to deny is overturned as a result of the informal review, processing for admission will resume.

If the family fails to appear for their informal review, the denial of admission will stand and the family will be so notified.

#### 16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555, Pub.L. 109-162]

PHAs must offer an informal hearing for certain PHA determinations relating to the individual circumstances of a participant family. A participant is defined as a family that has been admitted to the PHA's HCV program and is currently assisted in the program. The purpose of the informal hearing is to consider whether the PHA's decisions related to the family's circumstances are in accordance with the law, HUD regulations and PHA policies.

The PHA is not permitted to terminate a family's assistance until the time allowed for the family to request an informal hearing has elapsed, and any requested hearing has been completed. Termination of assistance for a participant may include any or all of the following:

- XII. Refusing to enter into a HAP contract or approve a lease
- XIII. Terminating housing assistance payments under an outstanding HAP contract
- XIV. Refusing to process or provide assistance under portability procedures

#### Decisions Subject to Informal Hearing

Circumstances for which the PHA must give a participant family an opportunity for an informal hearing are as follows:

- XV. A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment
- XVI. A determination of the appropriate utility allowance (if any) for tenant-paid utilities from the PHA utility allowance schedule
- XVII. A determination of the family unit size under the PHA's subsidy standards
- XVIII. A determination to terminate assistance for a participant family because of the family's actions or failure to act
- XIX. A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted under PHA policy and HUD rules
- XX. A determination to terminate a family's Family Self Sufficiency contract, withhold supportive services, or propose forfeiture of the family's escrow account [24 CFR 984.303(i)]

XXI. A determination to deny admission based on an unfavorable history that may be the result of domestic violence, dating violence, or stalking.

Circumstances for which an informal hearing is not required are as follows:

- XXII. Discretionary administrative determinations by the PHA
- XXIII. General policy issues or class grievances
- XXIV. Establishment of the PHA schedule of utility allowances for families in the program
- XXV. A PHA determination not to approve an extension or suspension of a voucher term
- XXVI. A PHA determination not to approve a unit or tenancy
- XXVII. A PHA determination that a unit selected by the applicant is not in compliance with the HQS
- XXVIII. A PHA determination that the unit is not in accordance with HQS because of family size
- XXIX. A determination by the PHA to exercise or not to exercise any right or remedy against an owner under a HAP contract

#### PHA Policy

The PHA will only offer participants the opportunity for an informal hearing when required to by the regulations.

#### Informal Hearing Procedures

##### Notice to the Family [24 CFR 982.555(c)]

When the PHA makes a decision that is subject to informal hearing procedures, the PHA must inform the family of its right to an informal hearing at the same time that it informs the family of the decision.

For decisions related to the family's annual or adjusted income, the determination of the appropriate utility allowance, and the determination of the family unit size, the PHA must notify the family that they may ask for an explanation of the basis of the determination, and that if they do not agree with the decision, they may request an informal hearing on the decision.

For decisions related to the termination of the family's assistance, or the denial of a family's request for an exception to the PHA's subsidy standards, the notice must contain a brief statement of the reasons for the decision, a statement that if the family does not agree with the decision, the family may request an informal hearing on the decision, and a statement of the deadline for the family to request an informal hearing.

#### PHA Policy

In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following:

The proposed action or decision of the PHA.

A brief statement of the reasons for the decision based on the regulatory reference.

The date the proposed action will take place.

A statement that if the family does not agree with the decision the family may request an informal hearing of the decision.



A deadline for the family to request the informal hearing.

To whom the hearing request should be addressed.

#### Scheduling an Informal Hearing [24 CFR 982.555(d)]

When an informal hearing is required, the PHA must proceed with the hearing in a reasonably expeditious manner upon the request of the family.

##### PHA Policy

A request for an informal hearing must be made in writing and/or verbally and received by the PHA no later than 14 days from the date of the PHA's decision or notice to terminate assistance.

The PHA must schedule and send written notice of the informal hearing to the family within 14 days of the family's request.

The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family or the desire to obtain legal representation. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date and time. At its discretion, the PHA may request documentation of the "good cause" prior to rescheduling the hearing.

If the family does not appear at the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

#### Pre-Hearing Right to Discovery [24 CFR 982.555(e)]

Participants and the PHA are permitted pre-hearing discovery rights. The family must be given the opportunity to examine before the hearing any PHA documents that are directly relevant to the hearing. The family must be allowed to copy any such documents at their own expense. If the PHA does not make the document available for examination on request of the family, the PHA may not rely on the document at the hearing.

The PHA hearing procedures may provide that the PHA must be given the opportunity to examine at the PHA offices before the hearing, any family documents that are directly relevant to the hearing. The PHA must be allowed to copy any such document at the PHA's expense. If the family does not make the document available for examination on request of the PHA, the family may not rely on the document at the hearing.

For the purpose of informal hearings, documents include records and regulations.

##### PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. In requesting copies of documents or review of the file the family must request an appointment with the Housing Coordinators no later than 24 hours prior to the scheduled hearing date.

The PHA must be given an opportunity to examine at the PHA offices before the hearing any family documents that are directly relevant to the hearing.

#### Participant's Right to Bring Counsel [24 CFR 982.555(e)(3)]

At its own expense, the family may be represented by a lawyer or other representative at the informal hearing.

Informal Hearing Officer [24 CFR 982.555(e)(4)]

Informal hearings will be conducted by a person or persons approved by the PHA, other than the person who made or approved the decision or a subordinate of the person who made or approved the decision.

#### Attendance at the Informal Hearing

##### PHA Policy

Hearings may be attended by a hearing officer and the following applicable persons:

- A PHA representative(s) and any witnesses for the PHA

- The participant and any witnesses for the participant

- The participant's counsel or other representative

- Any other person approved by the PHA as a reasonable accommodation for a person with a disability

#### Conduct at Hearings

The person who conducts the hearing may regulate the conduct of the hearing in accordance with the PHA's hearing procedures [24 CFR 982.555(4)(ii)].

##### PHA Policy

The hearing officer is responsible to manage the order of business and to ensure that hearings are conducted in a professional and businesslike manner. Attendees are expected to comply with all hearing procedures established by the hearing officer and guidelines for conduct. Any person demonstrating disruptive, abusive or otherwise inappropriate behavior will be excused from the hearing at the discretion of the hearing officer.

Evidence [24 CFR 982.555(e)(5)]

The PHA and the family must be given the opportunity to present evidence and question any witnesses. In general, all evidence is admissible at an informal hearing. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

##### PHA Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

- Oral evidence: the testimony of witnesses

- Documentary evidence: a writing which is relevant to the case, for example, a letter written to the PHA. Writings include all forms of recorded communication or representation, including letters, words, pictures, sounds, videotapes or symbols or combinations thereof.

- Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

- Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.

If either the PHA or the family fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence.

Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.

#### Hearing Officer's Decision [24 CFR 982.555(e)(6)]

The person who conducts the hearing must issue a written decision, stating briefly the reasons for the decision. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing.

#### PHA Policy

In rendering a decision, the hearing officer will consider the following matters:

PHA Notice to the Family: The hearing officer will determine if the reasons for the PHA's decision are factually stated in the Notice.

Discovery: The hearing officer will determine if the PHA and the family were given the opportunity to examine any relevant documents in accordance with PHA policy.

PHA Evidence to Support the PHA Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support the PHA's conclusion.

Validity of Grounds for Termination of Assistance (when applicable): The hearing officer will determine if the termination of assistance is for one of the grounds specified in the HUD regulations and PHA policies. If the grounds for termination are not specified in the regulations or in compliance with PHA policies, then the decision of the PHA will be overturned.

The hearing officer will issue a written decision to the family and the PHA no later than 14 days after the hearing. The report will contain the following information:

#### Hearing information:

Name of the participant;

Date, time and place of the hearing;

Name of the hearing officer;

Name of the PHA representative; and

Name of family representative (if any).

Background: A brief, impartial statement of the reason for the hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts

that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the PHA's decision.

Order: The hearing report will include a statement of whether the PHA's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the PHA to change the decision in accordance with the hearing officer's determination. In the case of termination of assistance, the hearing officer will instruct the PHA to restore the participant's program status.

#### Procedures for Rehearing or Further Hearing

##### PHA Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of the PHA will take effect and another hearing will not be granted.

It shall be within the sole discretion of the PHA to review the hearing decision.

##### PHA Notice of Final Decision [24 CFR 982.555(f)]

The PHA is not bound by the decision of the hearing officer for matters in which the PHA is not required to provide an opportunity for a hearing, decisions that exceed the authority of the hearing officer, decisions that conflict with or contradict HUD regulations, requirements, or are otherwise contrary to Federal, State or local laws.

If the PHA determines it is not bound by the hearing officer's decision in accordance with HUD regulations, the PHA must promptly notify the family of the determination and the reason for the determination.

##### PHA Policy

The PHA will mail a "Notice of Final Decision" including the hearing officer's report, to the participant and their representative. This Notice will be sent by first-class mail. A copy of the "Notice of Final Decision" will be maintained in the participant's file.

#### 16-III.D. HEARING AND APPEAL PROVISIONS FOR NON-CITIZENS [24 CFR 5.514]

Denial or termination of assistance based on immigration status is subject to special hearing and notice rules. Applicants who are denied assistance due to immigration status are entitled to an informal hearing, not an informal review.

Assistance to a family may not be delayed, denied, or terminated on the basis of immigration status at any time prior to a decision under the United States Citizenship and Immigration Services (USCIS) appeal process. Assistance to a family may not be terminated or denied while the PHA hearing is pending, but assistance to an applicant may be delayed pending the completion of the informal hearing.

A decision against a family member, issued in accordance with the USCIS appeal process or the PHA informal hearing process, does not preclude the family from exercising the right, that may otherwise be available, to seek redress directly through judicial procedures.

##### Notice of Denial or Termination of Assistance [24 CFR 5.514(d)]

As discussed in Chapters 3 and 11, the notice of denial or termination of assistance for noncitizens must advise the family:

- XXX. That financial assistance will be denied or terminated, and provide a brief explanation of the reasons for the proposed denial or termination of assistance.
- XXXI. The family may be eligible for proration of assistance.
- XXXII. In the case of a participant, the criteria and procedures for obtaining relief under the provisions for preservation of families [24 CFR 5.514 and 5.518].
- XXXIII. That the family has a right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or explanation in support of the appeal.
- XXXIV. That the family has a right to request an informal hearing with the PHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal.
- XXXV. For applicants, assistance may not be delayed until the conclusion of the USCIS appeal process, but assistance may be delayed during the period of the informal hearing process.

#### USCIS Appeal Process [24 CFR 5.514(e)]

When the PHA receives notification that the USCIS secondary verification failed to confirm eligible immigration status, the PHA must notify the family of the results of the USCIS verification. The family will have 30 days from the date of the notification to request an appeal of the USCIS results. The request for appeal must be made by the family in writing directly to the USCIS. The family must provide the PHA with a copy of the written request for appeal and the proof of mailing.

#### PHA Policy

The PHA will notify the family in writing of the results of the USCIS secondary verification within 14 days of receiving the results.

The family must provide the PHA with a copy of the written request for appeal and proof of mailing within 14 days of sending the request to the USCIS.

The family must forward to the designated USCIS office any additional documentation or written explanation in support of the appeal. This material must include a copy of the USCIS document verification request (used to process the secondary request) or such other form specified by the USCIS, and a letter indicating that the family is requesting an appeal of the USCIS immigration status verification results.

The USCIS will notify the family, with a copy to the PHA, of its decision. When the USCIS notifies the PHA of the decision, the PHA must notify the family of its right to request an informal hearing.

#### PHA Policy

The PHA will send written notice to the family of its right to request an informal hearing within 14 days of receiving notice of the USCIS decision regarding the family's immigration status.

#### Informal Hearing Procedures for Applicants [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 days of receipt of the PHA notice of denial, or within 30 days of receipt of the USCIS appeal decision.

The informal hearing procedures for applicant families are described below.

#### Informal Hearing Officer

The PHA must provide an informal hearing before an impartial individual, other than a person who made or approved the decision under review, and other than a person who is a subordinate of the person who made or approved the decision. See Section 16-III.C. for a listing of positions that serve as informal hearing officers.

## Evidence

The family must be provided the opportunity to examine and copy at the family's expense, at a reasonable time in advance of the hearing, any documents in the possession of the PHA pertaining to the family's eligibility status, or in the possession of the USCIS (as permitted by USCIS requirements), including any records and regulations that may be relevant to the hearing.

## PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page.

The family must be provided the opportunity to present evidence and arguments in support of eligible status. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The family must also be provided the opportunity to refute evidence relied upon by the PHA, and to confront and cross-examine all witnesses on whose testimony or information the PHA relies.

## Representation and Interpretive Services

The family is entitled to be represented by an attorney or other designee, at the family's expense, and to have such person make statements on the family's behalf.

The family is entitled to arrange for an interpreter to attend the hearing, at the expense of the family, or the PHA, as may be agreed upon by the two parties.

## Recording of the Hearing

The family is entitled to have the hearing recorded by audiotape. The PHA may, but is not required to provide a transcript of the hearing.

## Hearing Decision

The PHA must provide the family with a written final decision, based solely on the facts presented at the hearing, within 14 calendar days of the date of the informal hearing. The decision must state the basis for the decision.

## Informal Hearing Procedures for Residents [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 days of receipt of the PHA notice of termination, or within 30 days of receipt of the USCIS appeal decision.

For the informal hearing procedures that apply to participant families whose assistance is being terminated based on immigration status, see Section 16-III.C.

- 6. Designated Housing for Elderly and Disabled Families. With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected.**

N/A

- 7. Community Service and Self-Sufficiency. A description of: 1) Any programs relating to services and amenities provided or offered to assisted families; 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; 3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).**

HACSA meets on a regular basis with its Tenant Advisory Group (TAG), made up of Resident Representatives and Alternates, elected by their peers from their respective housing developments. Residents are assisted on a monthly basis, by HACSA's Resident Services Administrative Assistant (RSAA), in producing Resident Newsletters for their respective housing developments. The RSAA facilitates regular-scheduled Resident Coordinating Group (RCG) meetings at HACSA's different housing complexes. The RSAA assists the TAG in administering funds from the Resident Participation Fund, and in consulting with the various RCGs about expenditures from their respective Resident Accounts. The RSAA assists in the coordination of food distribution by Resident Volunteers, using donated foods from Food For Lane County (FFLC). Each summer, HACSA sponsors FFLC's Summer Meal Program at several of its housing development sites.

HACSA encourages the economic self-sufficiency of its residents by applying an Earned Income Disallowance (EID) to increases in annual earned income for a family member who was unemployed for one or more years previous to employment; to increases in annual earned income for a family member during participation in any economic self-sufficiency or other job training program; or to increases in annual earned income during or within six months after receiving assistance under a state program for temporary assistance for needy families (TANF). During the initial twelve month exclusion period, the EID is applied to all increases in annual earned income. During the second twelve month exclusion period, the EID is applied to 50% of all increases in annual earned income.

Since 1992, HACSA has managed a Family Self-Sufficiency (FSS) Program. Currently, the FSS Program is offered to both Section 8 and Public Housing participants. The purpose of the FSS Program is to assist families to improve their economic situations and to reduce their dependence on welfare programs. Each FSS participant works with an FSS Case Manager to create a five-year plan that includes employment goals and identifies training or education needs. FSS staff then work with the family to identify, locate, and arrange for the services needed to accomplish these goals. In addition, as FSS participants succeed in increasing their earned family income, the portion of their monthly income contributed towards their rent payment also increases. A percentage of this rent increase is deposited into an interest-bearing escrow account after HACSA has set up the account. If the family meets its goals within five years and has received no welfare assistance for one year, they are eligible to receive the funds in the escrow account. Since its inception, the HACSA FSS Program has assisted almost eighty (80) participants become home owners.

In 2011 HACSA received a 3 year Resident Services Coordinator grant to serve Public Housing residents in the Eugene / Springfield metro area. The RSC works with this population to assess their needs and connect them to resources and

supportive services that will promote self-sufficiency or increase elderly residents' ability to age in place.

HACSA's Community Service Policy is incorporated in HACSA's Statement of Policies, as Appendix H. During the intake process, each Public Housing applicant is required to sign a copy of HACSA's Community Service/Self-Sufficiency Compliance Certification, acknowledging their receipt of HACSA's Community Service Policy and acknowledging their requirement to contribute eight (8) hours per month of community service or participate eight (8) hours per month in an economic self-sufficiency program, unless otherwise exempt from this requirement. At each Annual Re-Certification, HACSA's Public Housing participants are required to sign the Certification again and, if not exempt, present a completed documentation form of activities performed over the previous twelve (12) months. If a family is found to be non-compliant with this requirement at recertification, s/he and the Head of Household will sign an agreement with HACSA to make up the deficient hours over the next twelve (12) month period. If the family is found to be non-compliant at the next recertification, the lease will not be renewed and the entire family will have to vacate the unit, unless the noncompliant member agrees to move out of the unit.

HACSA's Policy on Welfare Benefit Reductions is incorporated into HACSA's Statement of Policies, as Appendix M. A "covered family" is a family that receives welfare benefits from a welfare agency under a program that requires that a member of the family must participate in an economic self-sufficiency program as a condition of such assistance. "Imputed welfare income" is the amount of welfare benefits not received by the family, as a result of a specified welfare benefit reduction, that is included in the family's annual income calculation. "Specified welfare benefit reduction" is a reduction in welfare benefits because of fraud by a family member, or because of non-compliance with an economic self-sufficiency program. When a welfare agency informs HACSA of the amount of, and reason for, any specified welfare benefit reduction, HACSA will use this information to determine the imputed welfare income and count the imputed welfare income as income received by the family.

- 8. Safety and Crime Prevention. For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.**

There is no special need for measures to ensure the safety of HACSA's public housing residents; i.e., a daily review of Calls For Service related to HACSA's public housing developments indicates that the level of criminal activity in HACSA's public housing developments is similar to the level of criminal activity in the surrounding communities. Nevertheless, HACSA has a long-standing program of safety and crime prevention.

Since 1997, HACSA has tracked crime and crime-related problems in its public housing developments on a continuing basis. On a daily basis, the Eugene Police



Department provides HACSA with a Calls for Service Report, which lists the details of all police/emergency calls related to every unit owned by HACSA. As a LEDS (Law Enforcement Data System) Agency, HACSA has access to Lane County's Area Information Records System (AIRS), an automated information system managed by and serving a consortium of local public safety and justice agencies. HACSA Property Managers follow up on relevant calls, obtaining copies of related Police Reports, and taking appropriate lease enforcement action.

Since 1997, HACSA has utilized access to AIRS, OJIN (Oregon Justice Information Network) records, OSP (Oregon State Police) records, and NCIC (National Crime Information Center) records, to support its screening policies that limit access to its public housing program by applicants who have been involved in violent and/or drug-related criminal activity. HACSA denies admission to applicants who meet the applicable crime-related criteria.

Since 1997, HACSA has coordinated with eight (8) local police and law enforcement agencies (Florence Police Department, Eugene Police Department, Springfield Police Department, Junction City Police Department, Cottage Grove Police Department, Oregon State Police, Lane County Sheriff Office, and Lane County Parole and Probation) in carrying out crime prevention measures and activities. These activities include the screening criteria mentioned above, the review of daily Calls For Service reports mentioned above, the use of No Trespass Notices, the use of Letters of Concern, the use of Notices of Eviction, as well as providing regular information to HACSA's public housing residents about reporting criminal activity. In addition, HACSA currently provides an office location, in its largest public housing complex, for two Lane County Parole and Probation Officer.

#### **9. Pets. A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.**

From the Public Housing Statement of Policy:

#### **PET POLICY & RULES**

##### **1. Definitions/Applicability**

These pet rules quantify the legitimate interest of HACSA in providing decent, safe and sanitary living environments for existing and prospective residents, and in protecting and preserving the physical condition of the property and HACSA's financial interest in it. HACSA may designate individual employees to fulfill the obligations specified in this policy. Where designated, these persons will fulfill the obligations called for in this policy wherever HACSA is specified. Designated employees may include Property or Resident Managers, or other appropriate staff members.

Pets are domesticated animals, such as a dog, cat, bird, rabbit, fish, or turtle, that are traditionally kept in the home for pleasure rather than for commercial purposes. Common household pets do not include reptiles (except turtles). If this definition conflicts with any applicable State or local law or regulation defining the pets that may be owned or kept in dwelling accommodations, the State or local

law or regulations shall apply. HACSA reserves the right to determine what animal(s) will be allowed.

Exceptions to HACSA's Pet Policy & Rules will be considered, on a case-by-case basis, upon receipt of a Request for Reasonable Accommodation. Such Requests must verify that the Applicant/Resident making the request meets the definition of an Individual with a Disability and that the exemption being requested meets a specific disability-related need and would provide the Applicant/Resident with an equal opportunity to participate in and use HACSA's housing program(s). Please see HACSA's Policy on Reasonable Accommodation and/or HACSA's Assistance/Companion/Service Animal Guidelines.

## 2. Management Approval

- A. Prior to a pet being allowed to reside in a unit, the proposed pet owner must prepare and submit an "Application to Keep a Pet" to their Property Manager or Intake Coordinator.
- B. In addition, the Resident (or Applicant) must provide HACSA with documented acceptability in accordance with the provisions outlined in "Standards" below.
- C. Pets must be registered with HACSA BEFORE the pet is brought onto the premises and the registration may be reviewed or updated by HACSA on an "as-needed" basis.
- D. HACSA may give temporary approval for a pet to be on the premises prior to registration, pending approval of the "Application to Keep a Pet."
- E. Registration includes:
  - 1) A certificate (Category I pet only) signed by a licensed veterinarian or designated State or local authority, stating that:
    - a) The pet has received all inoculations required by State or local law.
    - b) The animal is in good health. It has no communicable diseases or pests, and in the case of dogs and cats, is spayed or neutered. For dogs, verification of the current weight and expected adult weight and size must also be provided.
  - 2) Verification that the animal is licensed in accordance with applicable State and local laws and regulations.
  - 3) A photo (Category I pet only) and sufficient information to identify the animal and demonstrate it is a common household pet.
  - 4) The name, address, and phone number of one or more "Responsible Parties" to care for the pet if the owner dies, is incapacitated or is unavailable to care for the pet. A Resident who cares for another Resident's pet must notify HACSA in writing that they will be caring for the pet and are willing to abide by the Pet Rules and Policies.

- 5) "Application to Keep a Pet" stating that the Resident accepts complete responsibility for the care and cleaning of the pet and acknowledges the applicable rules.
- F. These requirements may not conflict with State or local law.
  - G. An animal's temperament may be considered as a factor in determining the prospective owner's ability to comply with the Pet Rules and Policies and other lease obligations. Dogs or cats having a history of, or exhibiting aggressive, intimidating, territorial or inappropriate behavior will not be approved.
  - H. HACSA shall refuse to register a pet if:
    - 1) It is not a common household pet (as defined and allowed by HACSA).
    - 2) The Resident fails to provide complete pet registration information or fails to update the registration as requested by HACSA or, if HACSA reasonably determines, based on the Resident's habits and practices, that the Resident will be unable to keep the pet in compliance with the Pet Rules and Policies and other lease obligations.
  - I. HACSA may not refuse to register a pet based on the determination that a pet owner is financially unable to care for the pet, or the determination that the pet is inappropriate based on the therapeutic value to the pet owner, the interests of the property, or existing residents. HACSA is required to notify the Resident if HACSA refuses to register the pet. The notice shall state the basis for HACSA's action and may be combined with a notice of pet violation or lease termination.
3. Standards

Common household pets will be permitted under the following guidelines. [Exceptions to these standards will be considered, on a case-by-case basis, upon receipt of a Request for Reasonable Accommodation. Such Requests must verify that the Applicant/Resident making the request meets the definition of an Individual with a Disability and that the exemption being requested meets a specific disability-related need and would provide the Applicant/Resident with an equal opportunity to participate in and use HACSA's housing program(s). Please see HACSA's Policy on Reasonable Accommodation and/or HACSA's Assistance/Companion/Service Animal Guidelines.]

Category I: Dog or Cat

Category II: Birds, Fish, Rodents, Turtles

#### A. CATEGORY I

- 1) Dogs
  - a) Maximum number of Category I animals in the household - one (1)
  - b) Must not exceed adult weight of 30 lbs or adult shoulder height of 15".
  - c) Must be housebroken within 8 weeks of approval or 6 months of age.
  - d) Must be spayed or neutered.
  - e) Must have all inoculations required by State law or local ordinance

- f) Must be licensed as required by State law or local ordinance
- g) Must wear a collar/tag with identification which allows the animal to be identified to the Resident. Animal name only is not sufficient identification.
- h) The following breeds or mixed breeds of will not be allowed:
  - German Shepherd
  - Rottweiler
  - Doberman Pinscher
  - Pit Bull
  - Chow
  - Spitz

HACSA reserves the right to prohibit other breeds, as necessary.

- 2) Cats (Domestic Only)
  - a) Maximum number of Category I animals in the household - one (1)
  - b) Must be spayed or neutered.
  - c) Must have all inoculations required by State law or local ordinance.
  - d) Must be trained to use a plastic litter box or other non-porous waste receptacle within 8 weeks of approval or 6 months of age.
  - e) Must be licensed as required by State law or local ordinance
  - f) Must wear a collar/tag with identification which allows the animal to be identified to the Resident. Animal name only is not sufficient identification.
- B. CATEGORY II
  - 1) Birds
    - a) Maximum number - two (2)
    - b) Must be caged at all times.
  - 2) Fish
    - a) Maximum number - one (1) aquarium
    - b) Maximum aquarium size - 20 gallons
    - c) Must be kept on an approved stand.
  - 3) Rodents (ONLY rabbit, guinea pig, hamster or gerbil)
    - a) Maximum number - one (1)
    - b) Must be caged at all times.
    - c) Must have all inoculations required by State law or local ordinance.
  - 4) Turtles
    - a) Maximum number - two (2) small (shell up to 3") or one (1) medium (shell up to 5")
    - b) Must be kept in a tank (aquarium) or terrarium at all times.
- C. Any animal prohibited by law will not be approved in the jurisdiction where prohibited.
- D. Only pets specified above may be kept by a Resident. NO OTHER PETS will be considered common household pets without a modification of these rules by HACSA.

E. A Resident may have a maximum combination of:

- 1) One "Category I" + two "Category II" pets (example: dog + two birds + fish);  
OR
- 2) Two "Category II" pets (for example: two birds + fish; or, fish+ one guinea pig).
- 3) No two "Category II" pets may be the same (for example: two rodents; or two aquariums; or four (two sets of two) birds would not be allowed).

F. If an approved animal gives birth to a litter, the Resident shall remove all animals resulting from that birth within eight (8) weeks, leaving ONLY the originally approved animal. The Resident must provide verification to the Property Manager that the originally approved animal has been spayed within 10 weeks of giving birth to a litter.

G. Failure to register a pet before bringing it into the dwelling unit may result in the initiation of an action to require the Resident to remove the pet and/or to evict the Resident.

#### 4. Service/Assistance & Companion Animal Exclusion

Exceptions to HACSA's Pet Policy & Rules will be considered, on a case-by-case basis, upon receipt of a Request for Reasonable Accommodation. Such Requests must verify that the Applicant/Resident making the request meets the definition of an Individual with a Disability and that the exemption being requested meets a specific disability-related need and would provide the Applicant/Resident with an equal opportunity to participate in and use HACSA's housing program(s). Please see HACSA's Policy on Reasonable Accommodation and/or HACSA's Assistance/Companion/Service Animal Guidelines.

#### 5. Animals Temporarily on the Premises

Animals not owned by a Resident or not approved by HACSA are not allowed on the premises. "Visiting" animals are not allowed! This prohibition does not apply to visiting service/assistance animals. Feeding or harboring stray animals is not allowed, and will be considered a lease violation as having a pet without the written permission of HACSA.

#### 6. Pet Deposit

A. The pet deposit is for the purpose of defraying reasonable costs directly attributable to the presence of a pet. No deposit will be collected for Category II pets. HACSA reserves the right (as allowed by federal regulation) to change the deposit by amendment to these rules. The Resident pet owner is responsible for fumigation or cleaning charges directly related to the pet, or damages caused by the pet.

B. The deposit for a dog or cat is \$150.00 – payment options (by program) are as follows:

- 1) Project-Based Section 8: Minimum initial payment of \$50.00, followed by minimum monthly payments of \$10.00 until the deposit is paid in full.
  - 2) All Other Programs: Minimum initial payment of \$50.00, plus a minimum of two subsequent monthly payments of \$50.00 each until the deposit is paid in full.
  - 3) An Applicant or Resident household may pay the deposit in full, or may make increased payments to pay the deposit more quickly.
- C. No Pet Deposit shall be charged for service/assistance/companion animals – i.e., animals allowed as a Reasonable Accommodation -- though the Resident is still responsible for any fumigation or cleaning charges directly related to the animal or damages caused by the animal.
- D. Reasonable expenses for damages owing to the presence of the pet in the complex shall be the responsibility of the Resident/Pet Owner, including but not limited to:
- 1) Cost of damages (including repair and/or replacement) to any HACSA property; and
  - 2) Cost of fumigation of the dwelling unit for fleas or other pests.
- E. The Pet Deposit shall be refunded, less any deductions for fumigation, cleaning or damages related to the pet, when the Resident vacates the unit or when the Resident no longer keeps the pet, whichever is earlier. The Resident/Pet Owner shall be billed for animal damages for the amount of costs in excess of the pet deposit. HACSA will provide the Resident with an accounting of their pet deposit (along with any refund, if applicable) within 31 days of vacating their unit (30 days at Abbie Lane, Fourteen Pines or Village Oaks), or within 31 days of HACSA verifying that the pet has been removed from the premises (30 days at Abbie Lane, Fourteen Pines or Village Oaks).
- F. HACSA strongly recommends that Residents purchase a personal liability insurance (renter's insurance) policy from an insurance carrier of their choice. An animal owner may be liable for any injury or damage the animal causes to the person or property of another Resident, guest, HACSA personnel, its agents and/or contractors.
7. Animal Waste Removal Charge
- A minimum charge of \$5.00 per occurrence may be assessed if the Resident does not properly dispose of animal waste, in accordance with these rules and the dwelling lease.
8. Animal Areas
- A. Animals must be maintained within the Resident's unit. When outside, all animals must be kept on a leash, carried and/or under the immediate control of the Resident or other responsible individual AT ALL TIMES. Residents must take

their animal(s) to designated Pet Areas (if available in the complex) for purposes of urination and waste deposits. Residents are responsible for the immediate removal of their animal's waste.

- B. Only units with adequately fenced yard areas will be allowed to have animals maintained outside their unit, in the Resident's assigned yard area, which does not extend into the neighbor's area (e.g. single-family units and duplexes).

#### 9. Disturbances / Damages

The Resident agrees to control the noise and/or behavior of his/her animal so that such noise and/or behavior does not constitute a nuisance to others nor disturb their peaceful enjoyment of the premises. Failure to control animal noise and/or behavior may result in action to remove the animal or to terminate tenancy. This includes, but is not limited to:

- A. Loud or continuous barking, howling, whining or chirping longer than 15 minutes;
- B. Biting, scratching, digging holes, destroying property, or similar occurrences.

The Resident is responsible for any damages to HACSA property, staff, or to third parties (including other residents or guests) caused by their animal. The Resident agrees to indemnify, defend, and hold harmless HACSA and its staff, agents and contractors from any claims by or injuries to third parties or their property caused by or as a result of actions by their animal(s). The Resident may also be liable for legal costs incurred by HACSA as a result of actions taken by HACSA in response to animal-related incidents.

#### 10. Considerations

No Resident, guest, or person under the Resident's control will be cruel to any animal.

#### 11. Cleanliness Requirements

- A. Requirements for Cats and Other Animals Using a Litter Box or Cage: The waste of caged animals and the litter from litter boxes must be disposed of in a sealed plastic trash bag and placed in the appropriate trash receptacle for the complex. Caged animal waste must be removed, and litter separated from the litter box daily. Litter box filler will be changed at least weekly. Litter will not be disposed of by being flushed through a toilet or sink, or dumped on complex grounds. Costs resulting from the improper disposal of animal waste will be charged to the Resident. Litter boxes and animal cages must be kept **INSIDE** the Resident's unit at all times.
- B. All Other Waste: The Resident must **IMMEDIATELY** dispose of his/her animal's waste in a sealed plastic trash bag placed in the appropriate trash receptacle for the complex.
- C. The Resident must immediately clean any dirt or animal waste tracked through or deposited in any common area, lobby, hall, elevator, or breezeway by his/her

animal(s).

- D. Odor: The Resident shall take adequate precautions to eliminate any animal odors within or around the unit and to maintain the unit in a sanitary condition at all times.
- E. Pets are not allowed in Community Rooms.

#### 12. Animal Care

- A. No animal may be left unattended in any unit for an unreasonable period of time (depending on the circumstances of each case and the nature of the animal).
- B. Resident is responsible for the adequate care, nutrition, exercise and medical attention for his/her animal. Animals must not be conspicuously unclean, or parasite infested.
- C. Resident must recognize that other Residents may have chemical sensitivities or allergies related to animals, or may be easily frightened or disorientated by animals. Resident agrees to exercise common sense and courtesy with respect to other Residents' right to peaceful and quiet enjoyment of common areas and dwelling unit.

#### 13. Alterations

Residents may not alter their inside or outside unit area or common areas of the complex without prior approval from HACSA. This includes creating an enclosure for an animal.

#### 14. Inspections

- A. For the safety of animals, staff, residents, guests & others, all "Category I" pets (cats & dogs), including service/assistance & companion animals, must be confined/restrained in the presence of any HACSA staff, or any of HACSA's agents and/or contractors.
- B. HACSA may, after giving notice to the Resident and during reasonable hours, enter and inspect the premises, in addition to other inspections allowed, if it has received a complaint alleging that the conduct or condition of an animal in the dwelling unit constitutes a nuisance or threat to the health or safety of the occupants, the complex, or other persons in the community. An inspection will also be permitted without notice if HACSA has reasonable grounds to believe that there is a threat to the health or safety of the animal, or that an urgent situation may exist.

#### 15. Responsible Parties

Resident must designate a Responsible Party for the care of the animal in case of the death, incapacity, or inability of the Resident to care for the animal.

#### 16. Pet Rule Violations



#### A. PET RULE VIOLATION NOTICE AND/OR NOTICE FOR ANIMAL REMOVAL

If a Resident violates a pet rule (thereby violating their lease), the Resident may be served with written notice. The notice will describe the violation(s) and the pet rule(s) cited. The notice will also state how to remedy the violation(s) and give a period of time during which the Resident may remedy the violation(s), subject to verification.

#### B. TERMINATION OF TENANCY

- 1) HACSA may terminate the Resident's tenancy based on a pet rule violation if:
  - a) Resident has failed to remove the animal or correct the pet rule violation(s); or
  - b) Resident has affected the health, safety, or right to peaceful enjoyment of the premises by other residents, guests, HACSA staff, or HACSA's agents and/or contractors.
- 2) Resident will have the period of time specified in the pet rule violation notice to correct the violation(s). If the Resident does not correct the violation(s), (s)he may request an Informal Settlement Discussion (ISD) (in accordance with HACSA policy).
- 3) Resident's failure to correct the violation(s), or to request or appear for an ISD, may result in termination of tenancy and/or the requirement to remove the animal.
- 4) If the Resident and HACSA are unable to resolve the violation(s) at the ISD, and the Resident has failed to correct the violation(s), HACSA may serve notice on the Resident to remove the animal and may proceed with termination of tenancy.

#### 17. Animal Removal

If the health or safety of an animal is threatened by the death, incapacity or inability of the owner to care for the animal, HACSA will contact the Responsible Party. If the Responsible Party is unable or unwilling to care for the animal, or if HACSA is unable to contact the Responsible Party with reasonable effort, HACSA may contact the appropriate State or local authority to request removal of the animal. If the Responsible Party is a HACSA resident, they may care for the animal in their unit for a maximum of fourteen (14) days. This time limit may be extended with prior written approval from HACSA.

#### 18. Emergencies

HACSA may require a Resident to immediately remove an animal and/or may contact appropriate State or local authorities to remove an animal that becomes vicious; displays symptoms of severe illness; or behaves in a way that threatens the health or safety of other animals, residents, guests, or HACSA's staff, agents or contractors; or is causing, or has caused, serious damage to the Resident's unit

or other HACSA property.

#### 19. Reasonable Accommodation

Exceptions to HACSA's Pet Policy & Rules will be considered, on a case-by-case basis, upon receipt of a Request for Reasonable Accommodation. Such Requests must verify that the Applicant/Resident making the request meets the definition of an Individual with a Disability and that the exemption being requested meets a specific disability-related need and would provide the Applicant/Resident with an equal opportunity to participate in and use HACSA's housing program(s). Please see HACSA's Policy on Reasonable Accommodation and/or HACSA's Assistance/Companion/Service Animal Guidelines.

#### **10. Civil Rights Certification. A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.**

In April 2006, the Office of Fair Housing and Equal Opportunity conducted a compliance review to determine whether or not the Agency was operating in compliance with Section 504 of the Rehabilitation Act of 1973 and in compliance with Title VI of the Civil Rights Act of 1964. On November 30, 2006, the Agency received its Letter of Determination of Compliance on the Title VI Compliance Review. On December 18, 2006, the Agency received its Letter Of Determination of Compliance on the Section 504 Compliance Review.

In April 2010, the Eugene-Springfield Consolidated Plan 2010 [A Five Year Strategic Plan for Housing and Community Development, covering the period of July 1, 2010 through June 30, 2015] was presented to the U.S. Department of Housing and Urban Development Oregon State Office, Northwest/Alaska Area.

The Consolidated Plan was developed by the City of Eugene and the City of Springfield in collaboration with Lane County. It covers the geographical area served by HACSA. HACSA was an active participant in the development of this Consolidated Plan. Please note in the attached "Acknowledgments" page that the Staff Team, which developed the Consolidated Plan 2010, included HACSA's Deputy Director, Dorothy Cummings.

An accompanying document is the Assessment of the Impediments to Fair Housing and Fair Housing Plan Strategies, developed by the same organizations, and utilizing information directly from the Consolidated Plan 2010. Historically, as a participant in the development of the Consolidated Plan, HACSA has utilized this Analysis of Impediments (AI) to Fair Housing as its AI and has worked to address those impediments in a reasonable fashion in view of the resources available.

HACSA has made a strong commitment to promoting Fair Housing rights and Fair

Housing choice by providing information regarding Fair Housing and Fair Housing choice to applicants, residents, and staff. Following is a list of actions that HACSA has taken to provide this information.

- The Fair Housing logo (“Equal Housing Opportunity”) is prominently displayed on location signs at HACSA’s two administrative offices and at its various housing complexes.
- The Fair Housing logo is prominently displayed on signs/banners at various HACSA locations, announcing the availability of low-income rental units.
- The Fair Housing logo is prominently displayed on HACSA’s website at [www.hacsa.org](http://www.hacsa.org).
- The Fair Housing logo is on HACSA letterhead and business cards.
- HACSA’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed in the lobbies of HACSA’s two administrative offices and in public areas at its various housing complexes.
- HACSA’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status is prominently displayed on HACSA’s website at [www.hacsa.org](http://www.hacsa.org).
- Chuck Hauk, HACSA’s Housing Director, is listed on HACSA’s Policy of Nondiscrimination on the Basis of Disability/Handicap Status, and in HACSA’s Statement of Policy, as HACSA’s 504/ADA Coordinator.
- Chuck Hauk, HACSA’s Housing Director and 504/ADA Coordinator, is also the Vice President of the Board of Directors of the Fair Housing Council of Oregon (FHCO).
- HUD form 928.1 (“We Do Business in Accordance With the Federal Fair Housing Law” poster) is prominently displayed in English and in Spanish in HACSA’s two administrative offices and in public areas at its various housing complexes.
- HUD form 1686-FHEO (“Fair Housing – It’s Your Right” pamphlet) is available in English and in Spanish in HACSA’s two administrative offices.
- “Filing a Housing Discrimination Complaint” – a pamphlet created by Consumer Action with funding from the U.S. Department of Housing and Urban Development (HUD) is available in English and in Spanish in HACSA’s two administrative offices.
- Applicants or residents, with questions about Fair Housing issues, are referred to the Fair Housing Council of Oregon, Legal Aid Services of Oregon (LASO) or Lane County Law & Advocacy Center (LCLAC), the Oregon Advocacy Center (OAC), the Lane Independent Living Alliance (LILA), the Oregon Bureau of Labor and Industries, and/or to the U.S. Department of Housing & Urban Development (HUD) / Office of Fair Housing and Equal Opportunity (FHEO).

- HACSA has a long-standing Policy on Reasonable Accommodation, which is recognized in the Pacific Northwest among Public Housing Authorities and by the regional HUD office as being comprehensive, well-written, and well-implemented.
- HACSA's Policy on Reasonable Accommodation is prominently displayed in HACSA's two administrative offices and in public areas of its various housing complexes. It is available to any applicant or resident and is included as Appendix D in HACSA's Statement of Policies. It is also posted on HACSA's website at [www.hacsa.org](http://www.hacsa.org).
- Applicants for, and recipients of, housing assistance from HACSA are advised of their right to request a reasonable accommodation to their disability. Information regarding reasonable accommodations is provided on the Pre-Application for Assistance, in Initial Determinations of Ineligibility, in the Public Housing and Assisted Housing Lease Agreements, in Notices of Eviction, in periodic resident newsletters, and discussed during the intake process, during any Informal Settlement Discussions, and during other discussions with applicants and/or residents when inquiries are made about accommodating disabilities.
- Under the terms of a Voluntary Compliance Agreement between the U.S. Department of HUD/FHEO and HACSA, HACSA's Pre-Application for Housing Assistance requests information from applicants – which is not used in determining their eligibility for housing – regarding their ethnicity, race, and disability status. This information is recorded and retained and available to HUD upon request.
- HACSA developed an ongoing Diversity Committee in April 2000. As a function of that committee, HACSA has completed outreach presentations to agencies representing youth, seniors/elderly, persons with physical and/or mental disabilities, and minorities, to help assure that a broad base of the community has access to information about the availability of housing. This outreach effort continues on an ongoing basis and representatives from a number of those social service / advocacy agencies serve on HACSA's Family Self-Sufficiency (FSS) Advisory Board. The Diversity Committee has also done outreach at the Festiva Latina, the Asian Celebration, Project Homeless Connect, and other community gatherings.
- HACSA maintains reception staff – as well as other staff in all departments that have ongoing contact with residents – who are bilingual in Spanish and English.
- HACSA has also worked to increase the ability of low income community members to access housing by developing an innovative program, in cooperation with Community LendingWorks, the lending arm of NEDCO (Neighborhood Economic Development Corporation), to assist applicants to its agency-owned housing programs, in obtaining loans to cover the cost of their security deposits, as they lease up with HACSA. HACSA indemnifies the loans, guaranteeing payment to NEDCO, should the applicant default.

## Impediments to Fair Housing

Impediment: *There is an inadequate supply of affordable housing.*

Nearly 50% of renter households and over 25% of owner households are cost-burdened by their housing (they spend over 30% of their income for housing). This is due to a combination of factors including inadequate income, a shortage of subsidized housing, and an array of factors that add to housing costs including taxes, utility costs, interest rates, special fees and assessments

Strategy: Continue to aggressively pursue additions to the supply of affordable housing through the use of government subsidies and incentives. Continue to leverage available resources to the extent feasible in order to create additional affordable housing units. Continue to work with governmental and community partners to identify job creation opportunities and other programs that provide income support.

**HACSA continues to pursue the additions of affordable housing through this strategy. Currently, HACSA is working in a cooperative venture with St. Vincent dePaul Society of Lane County in the development of Bascom Village, a 101 unit Affordable Housing development (1-, 2-, 3-, and 4-bedroom units with a Head Start program on-site) in Northeast Eugene. HACSA has also started working on a second cooperative venture with Metropolitan Affordable Housing, to develop an approximately 150 unit Affordable Housing development in Glenwood, an unincorporated area between Eugene and Springfield.**

**HACSA also makes use of several Local Preferences, in its Section 8 Housing Choice Voucher Program, in an effort to assist several identified “at risk” populations.**

- **Veteran Administration Supported Housing (VASH) Program.** A program through the local Veterans Administration for homeless vets who have a severe psychiatric or substance abuse disorder who agree to participate in clinical programs offered by the VA. After stabilization they may receive a Voucher through the Section 8 Program. HUD-VA funded, 60 Vouchers.
- **1915(c) Waiver.** Through a Fair Share Voucher grant HACSA provides Vouchers for disabled families living in Lane County who have a 1915(c) waiver administered by the Local Senior and Disabled Services (S&DS) office. 8 Vouchers.
- **Senior and Disabled Services – Title XIX clients.** For clients of the local S&DS office who are eligible to receive Title XIX services, who meet the eligibility requirements for Section 8, and who agree to receive case management as long as they meet the Title XIX criteria. 25 Vouchers.
- **Victims of Domestic Violence.** For clients who are in a transitional housing program through WomenSpace, who meet the eligibility requirements of the Section 8 Program, and who agree to receive one (1) year of case management. 25 Vouchers.
- **Shelter Plus Care Program participants.** To qualify, the participant must be on the Shelter Plus Care Program for at least two (2) years, be in compliance with case management requirements, and be in compliance with their Family Obligations. 25 Vouchers.
- **State of Oregon Foster Care Program.** For children in the foster care system. 25 Vouchers.

- **New Winds Apartments, Florence, Oregon.** This preference is for unaccompanied homeless persons living in Florence, Oregon who are disabled. The disabled individual agrees to receive case management for a period of two (2) years and to reside for those two (2) years in one (1) of sixteen (16) units at the New Winds Apartment complex in Florence, Oregon. Case management is provided through Peace Health Counseling Services or through Options Counseling in Florence, Oregon.
- **Homeless Local Preference.** This preference is for homeless clients, recently discharged from Oregon State Prison, who have been referred by Sponsors, Inc. – a transitional housing program – and who agree to two (2) years of case management. In addition to a Local Preference in the Section 8 Program for obtaining a Voucher, these clients are also entitled to a Local Preference in being offered an available unit at the Village Oaks Apartments and at the Firwood Apartments – both owned and managed by HACSA. 5 Vouchers.

Impediment: *Suitable sites for future low-income housing construction are difficult to find, are expensive to acquire, and some may have constraints that limit development opportunities.*

The availability of affordably developable land has diminished within the Eugene and Springfield Urban Growth Boundaries as the population has grown. Eugene is currently in the midst of land assessments to determine if an adequate supply of buildable residential land is available for the next 20 years. Springfield has recently completed an assessment and found that land is available. The availability of existing land for building housing presents several obstacles. These are defined in four criteria: (1) Is the land serviced? (2) Is the land available? (3) Is the land properly zoned? (4) Is the land affordable?

Some of the land use obstacles experiences in multi-family developments include:

- Infill developments experience challenges that add cost and difficulty when required to meet the same standards as suburban style “green-field” developments. These include the higher cost of construction when staging on a constrained site, the expense of vertical construction, constraints from setbacks and existing neighboring buildings. Eugene’s bicycle parking requirements can be difficult to meet on smaller sites. There is also the loss of economy of scale that is often available with larger developments.
- Parking standards typically require up to one parking space for each unit. This requirement may inhibit the development of housing due to the larger land requirement. This can be a major obstacle in the redevelopment of existing land. Some options to reduce parking for public-benefit housing in Eugene were eliminated during the 2001 code revisions. In 2009 they were partially recovered in land use code amendments, particularly for elderly and subsidized housing.

Strategies: As land supply policies are debated, consider the impacts on cost, which could impact Fair Housing choice.

In Eugene, continue the City’s landbank program, which acquires sites for future low-income housing. Identify Land Use Code provisions that may have a negative impact on the development of low-income housing as some problems may be identified in

the course of reviewing land use actions. Build on the efforts of Eugene's proposals for Opportunity Siting, which is intended to encourage quality in-fill housing. Work towards modifying infrastructure standards or authorizing the use of new technologies to significantly reduce the cost of housing. Consider expedited or "fast track" permitting and approvals for all affordable housing projects.

In Springfield consider explicit parking requirement waivers for affordable housing developments, fast track permitting for affordable housing developments and as-of-right density bonuses. Additional proposals include reducing or waiving system development charges, and exemptions from property taxes.

**HACSA has made good use of the City of Eugene's landbank program. For example, the 101 unit Affordable Housing complex, Bascom Village, is being developed in Northeast Eugene on an approximately 4 acre site which had been landbanked, specifically for the purpose of developing low-income housing.**

*Impediment: There is a limited awareness of fair housing policies in the broader community.*

There will consistently be a need to increase the level of knowledge in the community regarding fair housing rights due to the growth of protected class populations in the Eugene and Springfield area.

Strategy: Increase fair housing education and expand outreach to protected classes.

More fair housing education and resources in the community will increase awareness. This strategy includes providing information that will target landlords, protected classes, involve agencies that serve these protected classes, and encourage greater citizen participation through better education and advertising. The following examples would aid in this regional education effort.

- Supply bilingual and alternative-format fair housing materials in locations where there are higher concentrations of protected classes
- Promote fair housing policies and resources through public service announcements and advertisements (radio, TV, newspaper, and bus advertisements).
- Provide educational materials to all landlords through the annual Eugene billing that is tied to the Eugene Rental Housing Code fee.
- Supply community education materials to protected class organizations.
- Supply protected class service organizations with fair housing information so they can disseminate it to their target population.
- Schedule educational meetings for property managers on fair housing rights.

**HACSA continues to make its applicants, residents, and participants of its various housing programs aware of their fair housing rights, through explanations at various intake interviews and briefings, and through the dissemination of fair housing materials, including in English and Spanish versions. Protected classes are made aware of fair housing policies, as explained on HACSA's website ([www.hacsa.org](http://www.hacsa.org)). Visitors to HACSA's administrative offices, as well as its various housing complexes, are made aware of their fair housing rights through the use of the Fair Housing logo on signage and through the posting of Fair Housing declarations in prominent locations. HACSA assists in the education of landlords about Fair Housing obligations through**

communications with its Section 8 Voucher landlords and through participation in landlord organizations (e.g., Rental Owners Association of Lane County). In addition, HACSA's Housing Director, Chuck Hauk, continues to serve as Vice President of the Board of Directors for the Fair Housing Council of Oregon. Mr. Hauk has been a member of FHCO's Board of Directors for the last ten years. HACSA also regularly refers members of protected classes to resources such as the Fair Housing Council of Oregon, the Oregon Bureau of Labor and Industries, and to the Lane County Legal Aid and Advocacy Center, for assistance with Fair Housing issues. [Please see the attached list of actions that HACSA has taken to promote Fair Housing rights and Fair Housing choice.]

*Impediment: There are market conditions and housing industry practices that increase housing costs for decrease housing choice.*

The local rental vacancy rate for Eugene and Springfield has been low for over 20 years and is currently estimated to be between 3% and 4%. [This estimate is based on interviews in February 2010 with several large property management companies and an appraisal firm.] Many existing vacancies are found among the most expensive units and also reflect the inevitable vacancies that occur as housing transitions from one tenant to the next. Regionally, new construction of multi-family housing has primarily occurred in the neighborhoods close to the University of Oregon because they are able to command higher rental values, making the construction economically feasible. Because tenants compete for housing, landlords often charge application fees and costly move-in charges, such as expensive deposits, in addition to first and last month rents. Over 40% of renters are low-income. Many landlords now use credit reports as part of their screening. Fair housing complaint data has historically indicated circumstances where housing was denied due to past history, regardless of credit rehabilitation. Another practice that limits choice includes either industry standards or codes which place occupancy restrictions on extended or large families. Populations with disabilities also encounter resistance to accommodation.

Strategies:

Use federal ARRA, Homeless Prevention and Rapid Re-housing (HPRP) funds and help homeless or at-risk households with move-in costs. Funds for this type of assistance are also allocated through private donations, the City of Eugene, and the federal Emergency Food and Shelter Fund.

Work with community agencies, such as St. Vincent dePaul's Renter Rehabilitation Program and NEDCO's ABC's of Home Buying Program, to train renters to repair their credit and learn how to succeed and stabilize in housing.

Eugene adopted an incentive program (MUPTe) which offers a ten-year property tax exemption for new construction of multi-family housing within a targeted geographic area. The boundary was expanded in 2008 to include some traditionally low-income neighborhoods in a mass-transit oriented area. Eugene also offers a 20 year Low-Income Housing Tax Exemption (LITE).

HACSA has sponsored St. Vincent dePaul's Renter Rehabilitation Program for the last decade. HACSA makes its Community Room in McKenzie Village, its largest Public Housing development, located in Springfield, available on a weekly basis, for SVDP to hold its Renter Rehabilitation Program. HACSA has entered into an innovative program with Community LendingWorks, the lending arm of NEDCO, to assist applicants to its agency-owned housing programs, in obtaining loans to cover the cost of their security deposits, as they lease up with HACSA. HACSA indemnifies the loans, guaranteeing payment to NEDCO, should the applicant default. HACSA's Family Self-Sufficiency Program continues to work with NEDCO (which serves on the



**Advisory Board to HACSA's FSS Program) in referring participants to NEDCO's ABC's of Home Buying Program. HACSA will house applicants who would otherwise be ineligible due to past poor rental histories, under the terms of Service Provider Agreements with various community agencies, who agree to continue case management after the applicants have leased up in HACSA-owned housing.**

*Impediment: There are cultural differences and language barriers which inhibit access to fair housing.*

Cultural differences and language barriers are impediments to fair housing. Even though language itself is not a protected class, it parallels with national origin, ethnicity, and/or race in housing discrimination. As Eugene and Springfield's minority populations continue to grow and become a more significant percentage of the community, increasing cultural differences and language barriers become impediments to Fair Housing. Additionally, large families and households with low-incomes are challenged to find suitable affordable housing. In some cultures, including some Asian and Latino, large households are common and it is not uncommon for more than one family to live together.

*Strategy:* Strengthen communication with organizations that provide services to racial and ethnic minority populations. Cultural and language barriers in this community may be most evident in the Latino population because of its increasing size, but there are also other populations, including Asian and African-American, who may face discrimination based on ethnicity, race, or their national origin. There are resources in the community that can be utilized as a platform to begin a dialogue with ethnic and racial minorities. Examples include the NAACP, Centro LatinoAmericano, and the Eugene Human Rights and Equity office. Outreach can provide the foundation for strategies to address this impediment. A step in responding to this impediment is to recognize that when adequate communication is absent due to language barriers, discrimination can easily arise intentionally or unintentionally. Therefore, organizations that are involved with populations that speak languages other than English are encouraged to seek translation services related to tenant and landlord communication.

Communicating with organizations that advocate for protected classes can result in people learning about fair housing rights, and provides government staff with a valuable network within the community to help in gauging the extent of fair housing violations.

**HACSA continues to ensure that the front/reception desks at both of its administrative offices are staffed with bilingual staff (English/Spanish). A number of other HACSA staff (in the Section 8 Program, in the Maintenance Division, and in the Family Self-Sufficiency Program) are also bilingual. HACSA has made a point of supporting both the Centro LatinoAmericano and the Blacks In Government (B.I.G.) organizations by financially supporting their annual fund-raising dinners. HACSA checks in with these organizations periodically to make sure its outreach efforts to the populations served by these organizations are adequate and effective. HACSA's Housing Director, Chuck Hauk, is a member of B.I.G. Materials are provided in Spanish when appropriate. Spanish-speaking clients are advised (in Spanish) to contact HACSA and request a translator when necessary. HACSA ensures that a competent translator is utilized when communicating with Spanish-speaking clients. Fair Housing materials (pamphlets and posters) are available in both English and Spanish.**

*Impediment: E-mail and the Internet have become vital to access housing opportunities and subsidy programs, providing a barrier for those without computer access at home.*

Strategy: Eugene and Springfield provide free Internet access at their public libraries and other City facilities. Eugene, through the use of a telecom grant, is placing computers and providing high-speed Internet service at the twelve locations of social services that serve homeless and very-low-income populations.

**HACSA has established and maintained Neighborhood Network Computer Centers at two of its Multi-Family Housing developments, making computers available to residents. Computers are also available at a number of other Public Housing Community Rooms for the use of residents. Through its Family Self-Sufficiency Program, HACSA has been able to make donated computers available to clients on a number of occasions. HACSA continues to explore the feasibility of providing Wi-Fi access at its various housing developments.**

Impediment: *People with disabilities who have special housing needs have limited choices and are often constrained by their lower incomes.*

Strategy: Eugene and Springfield have housing rehabilitation loan programs and also programs targeted to the removal of architectural barriers. Additionally, both jurisdictions support the acquisition and creation of affordable housing which includes homes designed with special features for people with disabilities. The Fair Housing Council of Oregon provides information on all aspects of Fair Housing, including information for people with disabilities.

**HACSA has almost completed its ongoing program of the remodeling of low-income housing units (owned by HACSA) towards the goal of a minimum of 5% of its units being completely accessible to residents who use wheelchairs. [Please see the attached listing of fully wheelchair-accessible units in HACSA's Public Housing program.] HACSA works at housing residents in need of those accessible features in these units. HACSA's Policy on Reasonable Accommodation (established in 1996) is considered a model in the Northwest Region. HACSA's Housing Director, Chuck Hauk, who also serves as HACSA's 504/ADA Coordinator, is considered an expert and a resource in the Northwest Region in the area of Reasonable Accommodations. HACSA, under approved Reasonable Accommodation requests, has provided ramps, grab bars, raised toilets, lever handles, transfer benches, the installation of air conditioners, etc. on a continuing basis. HACSA acts on approximately 200-300 Reasonable Accommodation requests a year, in its continuing efforts to make its housing accessible to people with disabilities. HACSA continues to work with various community organizations who serve disabled populations, such as Lane County Mental Health, South Lane Mental Health, Laurel Hill Center, Shelter Care, and LookingGlass.**

**504/ADA****Mobility Impaired/ Wheelchair Accessible Units in Public Housing****01 May 2012**

<u>Proj. No.</u>	<u>AMP</u>	<u>Unit No.</u>	<u>BR Size</u>	<u>Unit Address</u>
6-01	100	009	2	1043 Maple St., Florence, OR 97439
6-01	100	010	2	1045 Maple St., Florence, OR 97439
6-02	200	011	2	1625 N. First St., Springfield, OR 97477
6-02	200	017	2	1591 N. First St., Springfield, OR 97477
6-02	200	018	2	1583 N. First St., Springfield, OR 97477
6-02	200	027	2	1525 N. First St., Springfield, OR 97477
6-02	200	061	2	116 W. Olympic St., Springfield, OR 97477
6-02	200	066	2	135 W. Olympic St., Springfield, OR 97477
6-02	200	082	2	313 Fairview Dr., Springfield, OR 97477
6-02	200	136	2	463 W. Quinalt St., Springfield, OR 97477
6-02	200	144	2	484 W. Fairview Dr., Springfield, OR 97477
6-04	400	103	1	255 High St., #103, Eugene, OR 97401
6-04	400	104	1	255 High St., #104, Eugene, OR 97401
6-04	400	106	2	255 High St., #106, Eugene, OR 97401
6-04	400	107	1	255 High St., #107, Eugene, OR 97401
6-04	400	112	2	255 High St., #112, Eugene, OR 97401
6-04	400	235	2	255 High St., #235, Eugene, OR 97401
6-04	400	238	1	255 High St., #238, Eugene, OR 97401
6-04	400	239	2	255 High St., #239, Eugene, OR 97401
6-05	500	102	1	840 Holly St., #102, Junction City, OR 97448
6-05	500	118	1	840 Holly St., #118, Junction City, OR 97448
6-06	600	014	1	350 S. 2 <sup>nd</sup> St., #14, Creswell, OR 97426
6-09	500	025	2	25115 E. Broadway Ave., #25, Veneta, OR 97487
6-09	500	030	2	25115 E. Broadway Ave., #30, Veneta, OR 97487
6-09	500	043	2	24915 McCutcheon St., Veneta, OR 97487
6-09	500	044	2	24919 McCutcheon St., Veneta, OR 97487
6-15	200	022	4	426 S. 37 <sup>th</sup> Pl., Springfield, OR 97478
6-18	600	030	1	350 S. 2 <sup>nd</sup> St., #30, Creswell, OR 97426
6-18	600	031	1	350 S. 2 <sup>nd</sup> St., #31, Creswell, OR 97426
6-23	300	011	3	310 Rustic Pl., Eugene, OR 97401
6-24	300	023	3	2802 Matt Dr., Eugene, OR 97408
6-24	300	024	3	2804 Matt Dr., Eugene, OR 97408

**Projected Additional Units**

<u>Proj. No.</u>	<u>AMP</u>	<u>Unit No.</u>	<u>BR Size</u>	<u>Unit Address</u>	<u>Funding Yr</u>
6-02/-03	200	60	3	126 Olympic	FY 11
6-16	300	001	2	4253 Marcum Ln., Eugene, OR 97402	FY 10
6-16	300	002	2	4257 Marcum Ln., Eugene, OR 97402	FY 10
6-16	300	003	2	4261 Marcum Ln., Eugene, OR 97402	FY 10
6-06/-18	600	TBD	1	TBD (2 units)	FY 11 & FY 13
TBD	300	TBD	3	TBD (1 unit)	FY 12

**11. Fiscal Year Audit. The results of the most recent fiscal year audit for the PHA.**

The most recent fiscal year audit is for FY 11 and there were no findings.

**12. Asset Management. A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.**

Given the conversion to asset management, there is more involvement with Property Managers and other staff responsible for the financial and physical well being of each AMP. The modernization and rehabilitation team coordinate with AMP staff (including maintenance) to insure that the physical well being of each AMP is maintained. The Agency's Capital Needs Assessments (CNA) will guide the modernization and rehabilitation of the properties for at least the next ten years.

**13. Violence Against Women Act (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.**

The PHA has allocated 25 Section 8 Housing Choice Vouchers for victims of domestic violence who are in a transitional housing program through Womenspace and meet the eligibility requirements of the Section 8 Program and agree to two (2) years of case management.

Applicants for the Section 8 and Public Housing Programs who may be determined to be ineligible due to an unfavorable history are permitted to submit documentation for an Informal Review (Section 8) or Informal Hearing (Public Housing) affirming that the cause of the unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, or stalking. HACSA does not deny admission to its housing programs on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking if the applicant otherwise qualifies for admission.

Participants in the Section 8 and Public Housing Programs who provide documentation that a member of the family is a victim of domestic violence are provided with information about VAWA and Oregon landlord-tenant laws relating to domestic violence; are referred, as necessary, to programs which assist such victims; are given appropriate forms to provide his/her landlord with a lease termination notice (Section 8) and are provided with the documents necessary to transfer to another Section 8 subsidized unit with any PHA in the nation which

participates in the Housing Choice Voucher Program. With documentation confirming that the resident is a victim of domestic violence, a Public Housing resident may terminate their Lease Agreement with only 14 days notice – as opposed to the usually-required 30 days.

In the Public Housing Program, HACSA's Policy implementing the Violence Against Women (VAWA) Reauthorization Act of 2005 is incorporated into HACSA's Statement of Policies, as Appendix K. At the time of their intake interview, all applicants for HACSA's Public Housing Program are given a copy of this Policy and a copy of the Policy, with the applicant's/resident's signature, acknowledging receipt of the Policy, is retained in the tenant file.

HACSA does not provide activities, services, or programs directly to child or adult victims of domestic violence, dating violence, sexual assault, or stalking. Instead, HACSA continues its long-standing cooperative relationships with Womenspace and with SASS (Sexual Assault Support Services) and makes referrals to these organizations, as appropriate. Staff members from Womenspace and SASS continue to serve on the Advisory Board for HACSA's Family Self-Sufficiency Program.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 04/30/2011

<b>Part I: Summary</b> <b>PHA Name: Housing and Community Services Agency of Lane County (HACSA)</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 09 Replacement Housing Factor Grant No: Date of CFFP:		<b>FFY of Grant: 2009</b> <b>FFY of Grant Approval: 2009</b>	
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 2) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/31/12 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds	0	0	0	0
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	10,762.03	16,589.24	0	0
3	1408 Management Improvements	818.97	1,004.97	1,004.97	1,004.97
4	1410 Administration (may not exceed 10% of line 21)	126,809.00	126,809.00	126,809.00	126,809.00
5	1411 Audit	2,000.00	2,000.00	0	0
6	1415 Liquidated Damages	0	0	0	0
7	1430 Fees and Costs	152,000.00	160,907.87	159,358.50	130,999.02
8	1440 Site Acquisition	0	0	0	0
9	1450 Site Improvement	0	0	0	0
10	1460 Dwelling Structures	947,000.00	950,979.92	946,138.50	456,205.14
11	1465.1 Dwelling Equipment—Nonexpendable	0	0	0	0
12	1470 Non-dwelling Structures	0	0	0	0
13	1475 Non-dwelling Equipment	0	0	0	0
14	1485 Demolition	0	0	0	0
15	1492 Moving to Work Demonstration	0	0	0	0
16	1495.1 Relocation Costs	2,000.00	0	0	0
17	1499 Development Activities <sup>4</sup>	0	0	0	0

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.


<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 04/30/2011

<b>Part I: Summary</b>					
<b>PHA Name:</b> Housing and Community Services Agency of Lane County (HACSA)	<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 09 Replacement Housing Factor Grant No: Date of CFFP:	<b>FFY of Grant: 2009</b> <b>FFY of Grant Approval: 2009</b>			
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Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA	0	0	0	0
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	0	0	0	0
19	1502 Contingency (may not exceed 8% of line 20)	26,701.00	10,000.00	0	0
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,268,091.00	1,268,091.00	1,233,310.97	715,018.13
21	Amount of line 20 Related to LBP Activities	0	0	0	0
22	Amount of line 20 Related to Section 504 Activities	0	0	0	0
23	Amount of line 20 Related to Security - Soft Costs	0	0	0	0
24	Amount of line 20 Related to Security - Hard Costs	0	0	0	0
25	Amount of line 20 Related to Energy Conservation Measures	111,000.00	126,314.58	124,673.16	9,358.58
<b>Signature of Executive Director</b> 		<b>Date 03/31/12</b>		<b>Signature of Public Housing Director</b>  	
				<b>Date</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

<b>Part II: Supporting Pages</b>								
PHA Name: Housing and Community Services Agency of Lane County (HACSA)			<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 09 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2009		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
<b>AMP 600</b>	Replace Center Atrium Window for all Stories of building. (Other Window replacements in FY08 Cap Fund Grant)	1460	100%	111,000.00	126,314.58	124,673.16	9,358.58	Current Work
	Install new elevator.	1460	100%	836,000.00	700,882.66	700,882.66	446,846.56	Completed
	Modernize 1 elevator Phase I	1460	100%	0	123,582.68	120,582.68		From FY10 Current Work
	Engineering services (i.e. Structural, Mechanical, Electrical, etc.) for new and existing elevator	1430	100%	100,000.00	84,000.00	83,952.04	55,617.92	Current Work
	<b>Total Riverview Terrace</b>			<b>1,047,000.00</b>	<b>1,034,779.92</b>	<b>1,030,090.54</b>	<b>511,823.06</b>	
Other	Transfer – Operations	1406		10,762.03	16,589.24	0	0	
	Cap Fund Staff Training	1408		818.97	1,004.97	1,004.97	1,004.97	
	Grant Administration	1410		126,809.00	126,809.00	126,809.00	126,809.00	
	Grant Audit Fees	1411		2,000.00	2,000.00	0	0	
	Architect Services	1430		45,000.00	61,597.33	60,095.92	60,095.92	
	Sundries for support work	1430		7,000.00	15,310.54	15,310.54	15,285.18	
	Relocation	1495		2,000.00	0	0	0	
	Contingency	1502		26,701.00	10,000.00	0	0	
	<b>Total Other</b>			<b>221,091.00</b>	<b>233,311.08</b>	<b>203,220.43</b>	<b>203,195.07</b>	
	<b>TOTAL CAPITAL FUND GRANT BUDGET</b>			<b>1,268,091.00</b>	<b>1,268,091.00</b>	<b>1,233,310.97</b>	<b>715,018.13</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.



PHA Name: Housing and Community Services Agency of Lane County (HACSA)

[illegible]

Page4

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 04/30/2011

<b>Part I: Summary</b>					
<b>PHA Name: Housing and Community Services Agency of Lane County (HACSA)</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 10 Replacement Housing Factor Grant No: Date of CFFP:			<b>FFY of Grant: 2010</b> <b>FFY of Grant Approval: 2010</b>
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:1) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/31/12 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds	0	0	0	0
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	18,305.20	934.86	0	0
3	1408 Management Improvements	5,000.00	12,342.73	12,342.73	10,741.75
4	1410 Administration (may not exceed 10% of line 21)	125,620.80	125,620.80	125,620.80	125,620.80
5	1411 Audit	2,000.00	2,000.00	0	0
6	1415 Liquidated Damages	0	0	0	0
7	1430 Fees and Costs	68,000.00	66,730.00	24,304.02	18,009.02
8	1440 Site Acquisition	0	0	0	0
9	1450 Site Improvement	19,000.00	64,000.00	9,284.66	9,284.66
10	1460 Dwelling Structures	666,500.00	758,386.38	409,238.50	363,121.18
11	1465.1 Dwelling Equipment—Nonexpendable	204,750.00	85,773.96	15,301.24	15,301.24
12	1470 Non-dwelling Structures	89,250.00	89,250.00	0	0
13	1475 Non-dwelling Equipment	18,000.00	18,169.27	18,169.27	18,169.27
14	1485 Demolition	0	0	0	0
15	1492 Moving to Work Demonstration	0	0	0	0
16	1495.1 Relocation Costs	13,000.00	13,000.00	86.50	86.50
17	1499 Development Activities <sup>4</sup>	0		0	0

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 04/30/2011

<b>Part I: Summary</b>					
<b>PHA Name:</b> Housing and Community Services Agency of Lane County (HACSA)	<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 10 Replacement Housing Factor Grant No: Date of CFFP:	<b>FFY of Grant: 2010</b> <b>FFY of Grant Approval: 2010</b>			
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: 1) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/31/12 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA	0		0	0
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	0		0	0
19	1502 Contingency (may not exceed 8% of line 20)	26,782.00	20,000.00	0	0
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,256,208.00	1,256,208.00	✓ 614,347.72	560,334.42 ✓
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities		288,750.00	0	0
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	204,750.00	91,773.96	15,301.24	15,301.24
<b>Signature of Executive Director</b> 		<b>Date</b> 3/13/12		<b>Signature of Public Housing Director</b> 	
				<b>Date</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

<b>Part II: Supporting Pages</b>								
PHA Name: Housing and Community Services Agency of Lane County (HACSA)			Grant Type and Number Capital Fund Program Grant No: OR16P006 501 10 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2010		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
<b>AMP 200</b> McKenzie Village	Energy Improvement: Replace all electric heaters with energy efficient models	1465	172	204,750.00	0	0	0	Funded by HACSA Energy Services & Local Utility
	R&R Sidewalks	1450	Approx. 2,500 sqft	19,000.00	50,000.00	874.66	874.66	Spring 2012
	Bathtub & Wall Surround Upgrades (currently doing 38 in 09 ARRA)	1460	122	106,375.00	360,519.06	360,519.06	360,519.06	Quantity increased from FY11 Complete
	504/ADA Remodel - Duplex Unit	1460	1	106,375.00	0	0	0	Moved to FY11
Scattered Sites	Energy Efficient Heat Source Replacements	1465	1		8,000.00	0	0	Spring 2012
	R & R Driveways	1450	4		14,000.00	8,410.00	8,410.00	Moved from FY12
	<b>Total AMP 200</b>				<b>432,519.06</b>	<b>369,803.72</b>	<b>369,803.72</b>	
<b>AMP 300</b> Eugene Scattered Sites	504/ADA Remodel - Marcum	1460	3	288,750.00	348,750.00	2,478.63	2,478.63	Current Work
	Energy Efficient Heat Source Replacements	1465	11		65,000.00	2,780.80	2,780.80	Moved from FY15 Spring 2012
	<b>Total AMP 300</b>				<b>413,750.00</b>	<b>5,259.43</b>	<b>5,258.43</b>	
<b>AMP 400</b> Parkview Terrace	Remodel Recreation Room & Property Manager Office	1470	2	89,250.00	84,750.00	0	0	Current Work
	Engineering Services (i/e/ Structural, Mechanical, Electrical, etc.)	1430	1		15,500.00	10,230.00	3,935.00	Current Work
	Heating System Evaluation	1430	150		7,000.00	746.48	746.48	Moved from FY15
	Boiler Pump Upgrade	1465	1		6,870.00	6,870.00	6,870.00	Moved from FY15 Complete
	<b>Total AMP 400</b>				<b>114,120.00</b>	<b>17,846.48</b>	<b>11,551.48</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 04/30/2011

<b>Part II: Supporting Pages</b>								
PHA Name: Housing and Community Services Agency of Lane County (HACSA)			Grant Type and Number Capital Fund Program Grant No: OR16P006 501 10 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2010		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
<b>AMP 600</b>								
Riverview Terrace	Elevator Modernization- Phase 2 (Phase 1 FY09)	1460	1	165,000.00	49,117.32	46,240.81	123.49	Current Work
	Elevator Consultant	1430	1	10,000.00	0	0	0	Current Work
	Energy Upgrade Community Room HVAC	1465	1		4,903.96	4,903.96	4903.96	Moved from FY12 Complete
	<b>Total AMP 600</b>				<b>54,021.28</b>	<b>51,144.77</b>	<b>5,027.45</b>	
	<b>Work Items Total</b>			<b>989,500.00</b>	<b>1,014,410.34</b>	<b>444,054.40</b>	<b>391,642.08</b>	
Other	Transfer – Maintenance Dept.	1406		18,305.20	934.86	0	0	
	Cap Fund Staff Training	1408		5,000.00	12,342.73	12,342.73	10,741.75	
	Grant Administration	1410		125,620.80	125,620.80	125,620.80	125,620.80	
	Grant Audit Fees	1411		2,000.00	2,000.00	0	0	
	Architect Services	1430		50,000.00	41,730.00	9,497.25	9,497.25	
	Sundries for support work	1430		8,000.00	8,000.00	4,576.77	4,576.77	
	Equipment (Vehicle)	1475		18,000.00	18,169.27	18,169.27	18,169.27	
	Relocation	1495		13,000.00	13,000.00	86.50	86.50	
	Contingency	1502		26,782.00	20,000.00	0	0	
	<b>Total Other</b>			<b>266,708.00</b>	<b>241,797.66</b>	<b>170,293.32</b>	<b>168,692.34</b>	
	<b>TOTAL CAPITAL FUND GRANT BUDGET</b>			<b>1,256,208.00</b>	<b>1,256,280.00</b>	<b>614,347.72</b>	<b>560,334.42</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 04/30/2011

<b>Part I: Summary</b>					
PHA Name: Housing and Community Services Agency of Lane County (HACSA)		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 11 Replacement Housing Factor Grant No: Date of CFFP:			<b>FFY of Grant: 2011</b> <b>FFY of Grant Approval: 2011</b>
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:1) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/30/2012 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds	0			
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	123,877.00	148,002.00	0	0
3	1408 Management Improvements	15,000.00	15,000.00	2,808.28	2,808.28
4	1410 Administration (may not exceed 10% of line 21)	104,375.70	104,375.70	69,583.82	69,583.82
5	1411 Audit	2,000.00	2,000.00	0	0
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	48,000.00	48,000.00	0	0
8	1440 Site Acquisition	0			
9	1450 Site Improvement	0	30,500.00	0	0
10	1460 Dwelling Structures	675,316.00	611,691.00	4,548.00	4,548.00
11	1465.1 Dwelling Equipment—Nonexpendable	0			
12	1470 Non-dwelling Structures	0			
13	1475 Non-dwelling Equipment	10,000.00	10,000.00	3,324.66	2,787.12
14	1485 Demolition	27,000.00	36,000.00	0	0
15	1492 Moving to Work Demonstration	0			
16	1495.1 Relocation Costs	17,000.00	17,000.0	0	0
17	1499 Development Activities <sup>4</sup>	0			

<sup>1</sup> To be completed for the Performance and Evaluation Report.

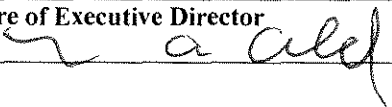
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 04/30/2011

<b>Part I: Summary</b>					
<b>PHA Name:</b> Housing and Community Services Agency of Lane County (HACSA)		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 11 Replacement Housing Factor Grant No: Date of CFFP:			<b>FFY of Grant: 2011</b> <b>FFY of Grant Approval: 2011</b>
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 3/31/2012 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA	0			
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	0			
19	1502 Contingency (may not exceed 8% of line 20)	21,188.30	21,188.30	0	0
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,043,757.00	1,043,757.00	80,264.76	79,727.22
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities	95,100.00	226,975.00	0	0
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures		52,500.00	0	0
<b>Signature of Executive Director</b> 		<b>Date</b> 3/31/12		<b>Signature of Public Housing Director</b> 	
				<b>Date</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.



<b>Part II: Supporting Pages</b>								
PHA Name: : Housing and Community Services Agency of Lane County (HACSA)			Grant Type and Number Capital Fund Program Grant No: OR16P006 501 11 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2011		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
AMP 100 Laurelwood Homes	Demo of 4 bedroom unit and old shop	1485	1	27,000.00	36,000.00	0	0	Current Work
	<b>AMP 100 Total</b>			<b>27,000.00</b>	<b>36,000.00</b>	<b>0</b>	<b>0</b>	
AMP 200 McKenzie Village	Bathtub & Wall Surround Upgrades (continuing work from FY 10)	1460	3	180,000.00	10,000.00	0	0	Spring 2012
	Bath Upgrades – Includes: Counters, vanity, flooring, med cabinet, etc.	1460	85	213,000.00	213,000.00	0	0	Winter 2012
	Install of new water meters	1460	172	52,500.00	52,500.00	0	0	Spring 2013
Scattered Sites	ADA/504 Remodel	1460	1		106,375.00	0		Moved from FY10 Winter 2012
AMP 200 Pengra Court	Bath Upgrades – Includes: Counters, vanity, flooring, med cabinet, etc.	1460	3	18,000.00	18,000.00	0	0	Winter 2012
	<b>AMP 200 Total</b>			<b>463,500.00</b>	<b>394,875.00</b>	<b>0</b>	<b>0</b>	
AMP 300 Scattered Sites	Interior & Exterior Minor Mods: 1 unit = exterior siding, flooring, bath fans, insulation, etc. and 2 units = gutters, windows, doors, electrical improvements, flooring, painting, kitchen & bath upgrades.	1460	3	116,716.00	116,716.00	4,548.00	4,548.00	Current Work
	<b>AMP 300 Total</b>			<b>116,716.00</b>	<b>116,716.00</b>	<b>4,548.00</b>	<b>4,548.00</b>	
AMP 400 Parkview	ADA/504 Parking Lot Cuts and Ramp	1450	5		30,500.00	0	0	Moved From FY15 July 2012
	<b>AMP 400 Total</b>				<b>30,500.00</b>	<b>0</b>	<b>0</b>	
AMP 600 Cresview Villa	ADA/504 Remodel	1460	1	95,100.00	95,100.00	0	0	Spring 2013
	<b>AMP 600 Total</b>			<b>95,100.00</b>	<b>95,100.00</b>	<b>0</b>	<b>0</b>	
	<b>WORK ITEMS TOTAL</b>			<b>702,316.00</b>	<b>611,691.00</b>	<b>4,548.00</b>	<b>4,548.00</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages								
PHA Name: : Housing and Community Services Agency of Lane County (HACSA)			Grant Type and Number Capital Fund Program Grant No: OR16P006 501 11 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2011		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
Other	Transfer – Maintenance Dept.	1406		123,877.00	148,002.00	0	0	
	Management Improvements – Staff Training & Development of Unit Tracking System	1408		15,000.00	15,000.00	2,808.28	2,808.28	
	Grant Administration	1410		104,375.70	104,375.70	69,583.82	69,583.82	
	Grant Audit Fees	1411		2,000.00	2,000.00	0	0	
	Architect Services	1430		40,000.00	40,000.00	0	0	
	Sundries for support work	1430		8,000.00	8,000.00	0	0	
	Site Improvements	1450			30,500.00	0	0	
	Communication Hardware Upgrade	1475		10,000.00	10,000.00	3,324.66	2,787.12	
	Demolition	1485		0	36,000.00	0	0	
	Relocation	1495		17,000.00	17,000.00	0	0	
	Contingency	1502		21,188.30	21,188.30	0	0	
	<b>“OTHER” TOTAL</b>			<b>341,441.00</b>	<b>432,066.00</b>	<b>80,264.76</b>	<b>79,727.00</b>	
	<b>TOTAL CAPITAL FUND GRANT BUDGET</b>			<b>1,043,757 .00</b>	<b>1,043,757.00</b>			

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 04/30/2011

<b>Part III: Implementation Schedule for Capital Fund Financing Program</b>					
PHA Name: : Housing and Community Services Agency of Lane County (HACSA)					Federal FFY of Grant: 2011
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
AMP 100 Laurelwood Homes	08/02/2013		08/02/2015		
AMP 200 McKenzie Village	08/02/2013		08/02/2015		
AMP 200 Pengra Court	08/02/2013		08/02/2015		
AMP 200 Scattered Site	08/02/2013		08/02/2015		
AMP 400 Parkview	08/02/2013		08/02/2015		
AMP 300 Scattered Sites	08/02/2013		08/02/2015		
AMP 600 Cresview Villa	08/02/2013		08/02/2015		

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

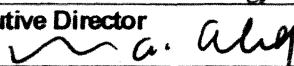

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

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U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 03/31/2014

<b>Part I: Summary</b>					
<b>PHA Name:</b> Housing and Community Services Agency of Lane County (HACSA) OR 600		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P006 501 12 Replacement Housing Factor Grant No: Date of CFFP:		<b>FFY of Grant: 2012</b> <b>FFY of Grant Approval: 2012</b>	
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	81,036.00			
3	1408 Management Improvements	13,650.00			
4	1410 Administration (may not exceed 10% of line 21)	96,154.00			
5	1411 Audit	2,000.00			
6	1415 Liquidated Damages				
7	1430 Fees and Costs	50,000.00			
8	1440 Site Acquisition				
9	1450 Site Improvement	299,410.00			
10	1460 Dwelling Structures	309,249.00			
11	1465.1 Dwelling Equipment—Nonexpendable	51,825.00			
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	18,500.00			
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs	9,716.00			
17	1499 Development Activities <sup>4</sup>				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	30,000.00			
20	Amount of Annual Grant:: (sum of lines 2 - 19)	961,540.00	\$ 0.00	\$ 0.00	\$ 0.00
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities	57,750.00			
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	51,825.00			
<b>Signature of Executive Director</b> 		<b>Date</b> 3/1/12	<b>Signature of Public Housing Director</b> 		<b>Date</b> 3-19-12

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

Part II: Supporting Pages								
PHA Name: Housing and Community Services Agency of Lane County (HACSA) OR 600		Grant Type and Number Capital Fund Program Grant No: OR16P006 501 12 CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: 2012		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
AMP 200 McKenzie Village	Bath Upgrades (continuing work from FY 11)	1460	79	190,000.00				
AMP 200 Pengra Court	Bath Upgrades (continuing work from FY 11)	1460	4	24,749.00				
	<b>AMP 200 Total</b>			<b>214,749.00</b>				
AMP 300 Scattered Sites	Energy Improvement: R/R Ranges & Hoods	1465	5	5,000.00				
AMP 300 Scattered Sites	Energy Improvement: R/R Toilets	1465	5	5,000.00				
AMP 300 Scattered Sites	R/R Driveways	1450	2	22,260.00				
AMP 300 Scattered Sites	R/R Sidewalks/Driveways	1450	7	50,000.00				
AMP 300 Scattered Sites	Paving Sidewalks	1450	10	30,000.00				
AMP 300 Scattered Sites	Paving Sidewalks/Patios	1450	26	119,700.00				
AMP 300 Maplewood Meadows	Energy & Safety Improvement: Exterior Lighting Upgrade	1465	38	4,725.00				
	<b>AMP 300 Total</b>			<b>236,685.00</b>				
AMP 500 Lindeborg Place	Community Room Upgrade which includes 504/ADA and flooring abatement	1460	1	57,750.00				
AMP 500 Veneta Villa	Energy Improvement: Furnace Upgrade	1465	1	5,250.00				
AMP 500 Scattered Sites	Energy & Safety Improvement: Exterior Lighting Upgrade	1465	60	5,250.00				
	<b>AMP 500 Total</b>			<b>68,250.00</b>				

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages								
PHA Name: Housing and Community Services Agency of Lane County (HACSA) OR 600		Grant Type and Number Capital Fund Program Grant No: OR16P006 501 12 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2012			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised 1	Funds Obligated2	Funds Expended2	
Amp 600 Cresview Villa	Community Room Remodel	1460	1	36,750.00				
AMP 600 Cresview Villa	Asphalt Overlay	1450	1	40,700.00				
AMP 600 Cresview Villa	Energy Improvement: R/R Range & Hoods	1465	34	26,600.00				
AMP 600 Riverview Terrace	Asphalt Overlay	1450	1	36,750.00				
	<b>AMP 600 Total</b>			<b>140,800.00</b>				
	<b>WORK ITEMS TOTAL</b>			<b>660,484.00</b>				
Other	Architect	1430		40,000.00				
	Audit	1411		2,000.00				
	Sundries for support work	1430		10,000.00				
	Relocation	1495		9,716.00				
	Contingency	1502		30,000.00				
	Management Improvements -Training	1408		3,650.00				
	Management Improvements- Create System Back-up Software	1408		10,000.00				
	PHA-Wide Non-dwelling Structures & Equipment-Computer & Related Hardware	1475		18,500.00				
	Grant Administration	1410		96,154.00				
	Transfer	1406		81,036.00				
	<b>"Other" Total</b>			<b>301,056.00</b>				
	<b>TOTAL CAPITAL FUND GRANT BUDGET</b>			<b>961,540.00</b>				

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

**Capital Fund Program—Five-Year Action Plan**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/20011

<b>Part I: Summary</b>						
PHA Name/Number : Housing and Community Services Agency of Lane County (HACSA) OR006			Locality (City/County & State) Eugene/Springfield, Lane County, Oregon		<input checked="" type="checkbox"/> <b>Original 5-Year Plan</b> <input type="checkbox"/> <b>Revision No:</b>	
A.	Development Number and Name	Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016
B.	Physical Improvements Subtotal	Annual Statement	649,349.70	630,556.00	592,830.30	684,180.00
C.	Management Improvements		22,500.00	12,500.00	15,000.00	10,000.00
D.	PHA-Wide Non-dwelling Structures and Equipment		19,500.00	10,000.00	10,000.00	0
E.	Administration		96,154.00	96,154.00	96,154.00	96,154.00
F.	Other		87,000.00	92,000.00	92,000.00	87,000.00
G.	Operations		87,036.30	120,330.00	155,555.70	84,206.00
H.	Demolition		0	0	0	0
I.	Development		0	0	0	0
J.	Capital Fund Financing – Debt Service		0	0	0	0
K.	Total CFP Funds					
L.	Total Non-CFP Funds		0	0	0	0
M.	Grand Total		961,540.00	961,540.00	961,540.00	961,540.00



**Capital Fund Program—Five-Year Action Plan**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/20011

**Part I: Summary (Continuation)**

PHA Name/Number : Housing and Community Services Agency of Lane County (HACSA) OR006			Locality (City/County & State) Eugene/Springfield, Lane County, Oregon		<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
A.	Development Number and Name	Work Statement for Year 1 FFY 12	Work Statement for Year 2 FFY13	Work Statement for Year 3 FFY 14	Work Statement for Year 4 FFY 15	Work Statement for Year 5 FFY 16
	AMP 100 Laurelwood Homes	See	0.00	0.00	0.00	28,500.00
	AMP 200 McKenzie Village	Annual	36,000.00	15,750.00	95,000.00	207,180.00
	AMP 200 Pengra Court	Statement	0.00	0.00	23,900.00	0.00
	AMP 200 Scattered Sites		0.00	35,000.00	0.00	10,000.00
	AMP 300 Scattered Sites		30,810.00	123,446.00	45,500.00	191,500.00
	AMP 300 Maplewood Meadows		23,900.00	136,500.00	30,000.00	198,000.00
	AMP 400 Parkview Terrace		418,979.70	192,250.00	163,995.30	7,500.00
	AMP 500 Lindeborg Place		18,900.00	0.00	128,700.00	0.00
	AMP 500 Veneta Villa		0.00	0.00	32,867.50	0.00
	AMP 500 Veneta Scattered Sites		0.00	0.00	32,867.50	0.00
	AMP 600 Cresview Villa		101,640.00	0.00	0.00	41,500.00
	AMP 600 Riverview Terrace		19,120.00	127,610.00	60,000.00	0.00
	<b>TOTAL</b>		<b>649,349.70</b>	<b>630,556.00</b>	<b>592,830.30</b>	<b>684,180.00</b>

<b>Part II: Supporting Pages – Physical Needs Work Statement(s)</b>						
Work Statement for Year 1 FFY 12	Work Statement for Year: 2 <b>FY 13</b>			Work Statement for Year: 2 <b>FY 13</b>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	AMP 200 McKenzie Village - Security Improvement Doors and Locks Replacements	36	36,000.00	AMP 600 Cresview Villa - Windows/Patio Doors/ Abatement	34 units	101,640.00
Annual	AMP 300 Scattered Sites - Toilet Replacements	55	22,200.00	AMP 600 Riverview Terrace - R & R Sidewalks	1	5,680.00
Statement	AMP 300 Scattered Sites -Water Heater Replacements	9	8,610.00	AMP 600 Riverview Terrace - Exterior Door Replacement of Building (not units)	12	13,440.00
	AMP 300 Maplewood Meadows - Water Heater Replacements	38	23,900.00			
	AMP 400 Parkview Terrace - Window Replacements Phase 1	128	418,979.70			
	AMP 500 Lindeborg Place - Paving & Concrete Work	1	18,900.00			
				<b>Subtotal of Estimated Cost</b>		<b>649,349.70</b>

<b>Part II: Supporting Pages – Physical Needs Work Statement(s)</b>						
Work Statement for Year 1 FFY 12	Work Statement for Year: 3 <b>FFY 14</b>			Work Statement for Year: 3 <b>FFY14</b>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	AMP 200 McKenzie Village - R/R Sidewalk		15,750.00	AMP 300 Maplewood Meadows - Energy Efficient Heat Source Upgrade	39	136,500.00
Annual	AMP 200 Scattered Sites - Window and Patio Door Replacement	9	25,000.00	AMP 400 Parkview Terrace - Energy Improvement: Unit Electric Meters	150 units	71,500.00
Statement	AMP 200 Scattered Sites - Fence Replacements	3	10,000.00	AMP 400 Parkview Terrace - Energy Improvement: Radiator Flush & Isolation and Control Valve Replacements.	150 units	120,750.00
	AMP 300 Scattered Sites - Window & Patio Door Replacement	2	8,000.00	AMP 600 Riverview Terrace - Seismic Upgrade to Building	1	127,610.00
	AMP 300 Scattered Sites - Window & Patio Door Replacement	5	27,000.00			
	AMP 300 Scattered Sites - Window & Patio Door Replacement	18	88,446.00			
				<b>Subtotal of Estimated Cost</b>		<b>630,556.00</b>

<b>Part II: Supporting Pages – Physical Needs Work Statement(s)</b>						
Work Statement for Year 1 FFY 12	Work Statement for Year: 4 <b>FFY 15</b>			Work Statement for Year: 4 <b>FFY15</b>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	AMP 200 McKenzie Village - Village and Admin Roofs. Phase 1	12 Duplexes	60,000.00	AMP 500 Lindeborg Place - Energy Improvement: Heater Valves, Radiator Flush	40	40,000.00
Annual	AMP 200 McKenzie Village - Security Improvement. Doors & Lock Replacements	35	35,000.00	AMP 500 Lindeborg Place - Balcony Decks	3700 Sq Ft	55,500.00
Statement	AMP 200 Pengra Court - Energy Improvements R/R Water Heaters	22	23,900.00	AMP 500 Lindeborg Place - Bath Upgrades	2	8,000.00
	AMP 300 Scattered Sites - Fence Replacements	13	45,500.00	AMP 500 Lindeborg Place - Energy Improvement: New Lighting	40	25,200.00
	AMP 300 Maplewood Meadows - ADA Kitchen Remodels	2	30,000.00	AMP 500 Veneta Villa - Asphalt Overlay	1	32,867.50
	AMP 400 Parkview Terrace - Window Replacement Phase 2	22	73,995.30	AMP 500 Veneta Scattered Sites Asphalt Overlay	1	32,867.50
	AMP 400 Parkview Terrace -Screen Door Replacements	150	70,000.00	AMP 600 Riverview Terrace - Balcony Decks/Rails	60	60,000.00
				<b>Subtotal of Estimated Cost:</b>		<b>592,830.30</b>

<b>Part II: Supporting Pages – Physical Needs Work Statement(s)</b>						
Work Statement for Year 1 FFY 12	Work Statement for Year: 5 <b>FFY 16</b>			Work Statement for Year: 5 <b>FFY16</b>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	AMP 100 Laurelwood - Chain Link Fence	1055'	21,000.00	AMP 300 Scattered Sites - Fence Replacements	11846'	191,500.00
Annual	AMP 100 Laurelwood - Energy Improvements: Ranges, Ref, Kit & Bath Fan, BB Heaters.	3	7,500.00	AMP 300 Maplewood Meadows - Office remodel	1	10,000.00
Statement	AMP 200 McKenzie Village - Village, Admin Roofs, Maint shop Roofs. Phase 2	15	75,000.00	AMP 300 Maplewood Meadows - Windows Units	38	188,000.00
	AMP 200 McKenzie Village - Admin Windows	24	14,400.00	AMP 400 Parkview Terrace - Mailboxes		7,500.00
	AMP 200 McKenzie Village - Admin & Maint. Shop Paint	1	12,000.00	AMP 600 Cresview Villa - Electrical Upgrades	14	28,000.00
	AMP 200 McKenzie Village - Wood Fencing	5289'	105,780.00	AMP 600 Cresview Villa - Mailboxes		3,500.00
	AMP 200 Scattered Sites - R/R Driveways	3	10,000.00	AMP 600 Cresview Villa - Office Remodel	1	10,000.00
				<b>Subtotal of Estimated Cost</b>		<b>684,180.00</b>

<b>Part III: Supporting Pages – Management Needs Work Statement(s)</b>				
Work Statement for Year 1 <b>FFY 12</b>	Work Statement for Year :2 <b>FFY 13</b>		Work Statement for Year: 3 <b>FFY 14</b>	
	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost
See	Modernization Staff Training	2,500.00	Modernization Staff Training	2,500.00
Annual	Equipment (i.e. Computers, Printers, Connectivity Hardware/Software Upgrade)	19,500.00	Equipment (i.e. Workstation Upgrade, File Server)	10,000.00
Statement	Management Improvements. Scattered Site Markey Analysis & Green Survey/Assessment	20,000.00	Energy Audit	10,000.00
	Subtotal of Estimated Cost	\$42,000.00	Subtotal of Estimated Cost	\$22,500.00

<b>Part III: Supporting Pages – Management Needs Work Statement(s)</b>				
Work Statement for Year 1 FFY 2012	Work Statement for Year: 4 FFY 15		Work Statement for Year: 5 FFY 16	
	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost
See	Modernization Staff Training	5,000.00	Energy Audit	10,000.00
Annual	Equipment (i.e. Computers & Printers)	10,000.00		
Statement	Energy Audit	10,000.00		
	Subtotal of Estimated Cost	\$25,000.00	Subtotal of Estimated Cost	\$10,000.00

**PHA Certifications of Compliance  
with PHA Plans and Related  
Regulations**

**U.S. Department of Housing and Urban Development**  
Office of Public and Indian Housing  
**Expires 4/30/2011**

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:  
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning 10/1/12 hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. ~~The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.~~ Strike-out per P/H Notice 2008-41 (Capital Fund Changes annually)
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.



12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

Housing And Community Services Agency Of Lane County

OR 006

PHA Name

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20\_\_\_\_ - 20\_\_\_\_

x Annual PHA Plan for Fiscal Years 20 12 - 20 13

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Title

Judith Pothier

Chair

Signature

Date

7/11/12

# Certification for a Drug-Free Workplace

U.S. Department of Housing  
and Urban Development

Applicant Name

Housing And Community Services Agency of Lane County OR

Program/Activity Receiving Federal Grant Funding

Capital Fund

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

**2. Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here ☐ if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.  
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

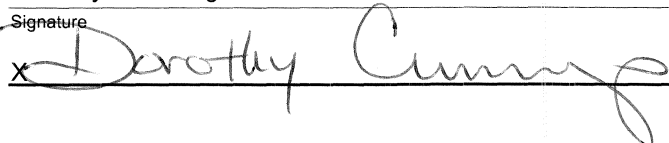
Name of Authorized Official

Dorothy Cummings

Title

Acting Executive Director

Signature



Date

05/07/2012

# Certification of Payments to Influence Federal Transactions

U.S. Department of Housing  
and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 01/31/2014)

Applicant Name

Housing And Community Services Agency of Lane County OR

Program/Activity Receiving Federal Grant Funding

Capital Fund

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.  
**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

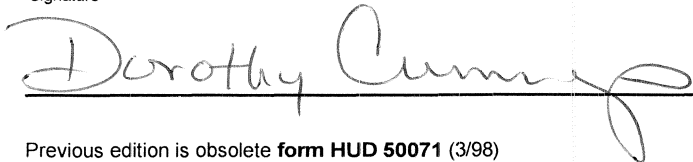
Name of Authorized Official

Dorothy Cummings

Title

Acting Executive Director

Signature



Date (mm/dd/yyyy)

05/07/2012

**Civil Rights Certification**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

**Civil Rights Certification****Annual Certification and Board Resolution**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*


The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Housing And Community Services of Lane County Or

OR006

PHA Name

PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)	
Name of Authorized Official	Judith Pothier
Title	Chair
Signature	
Date	7/11/12

# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

(See reverse for public burden disclosure.)

Approved by OMB

0348-0046

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: <sup>4c</sup>			<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:		
<b>6. Federal Department/Agency:</b>			<b>7. Federal Program Name/Description:</b>  CFDA Number, if applicable: _____		
<b>8. Federal Action Number, if known:</b>			<b>9. Award Amount, if known:</b> \$		
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):			<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u>Dorothy Cummings</u> Print Name: <u>Dorothy Cummings</u> Title: <u>Acting Executive Director</u> Telephone No.: <u>541-682-2503</u> Date: <u>05/07/2012</u>		
<b>Federal Use Only:</b>					Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

# Homeownership Update

April 2012



## Statistics for 2012

In 2012 there have been **3** Homeownership Information meetings (HOIM), including **0** evening meetings (the scheduled evening meeting was canceled due to snow and has been rescheduled for 4-25-12). **16** families expressed interest and were invited, **5** families attended (31.25%). We have also held 1 private in-home Information Meeting for a disabled individual in Florence.

### Program Statistics

To date **28** families have **purchased** homes in connection with the Section 8 Homeownership program: 26 families with on-going assistance and 2 without.

Home Location: **10** in Springfield, **4** in Eugene, **1** in Elmira, **2** in Junction City, **3** in Oakridge, **3** in Veneta, **3** in Cottage Grove, **1** in Goshen, **1** in Florence

Lender: **13** with Siuslaw Valley Mortgage, **14** with USDA, 1 with Summit (without on-going assistance)

To date **3** families have **terminated** their participation in the Section 8 Homeownership program.

Home Location: **1** in Elmira, **1** in Eugene, **1** in Springfield

Lender: **1** with USDA, **2** with Siuslaw Valley Mortgage

Reason for Termination: **2** release of Voucher, **1** at Zero Hap for 6 months

The total purchase price for the **28** homes is **\$4,184,801**; total amount of money loaned is **\$3,661,488**.

The average gross income at the time of closing for the 25 families was **\$17,797**.

Demographics at the time of closing:

**26** families consisting of **71** individuals, including **37** children

**16** female Head of Household, **5** two parent households

**15** head of household who qualified as Disabled, **2** who qualified as Senior

In 2012 we have had 1 **closing**. This family consists of a 73 year old disabled Veteran and was described in the previous report

Currently we do not have any families in the process of purchasing. While several families have made application with the USDA Direct Program, none have received an eligibility letter so far this year. I have been contacted by USDA requesting HAP information for two different families; neither appears to be in a position to purchase at this time. One family has recently discovered an unresolved credit issue, the other has not yet saved sufficient money for the downpayment. Both families are actively working to resolve the barriers and I expect them to be ready to purchase in about one year.

We have been working with a disabled Veteran in Oakridge for several years, as he has attended the homeownership education and counseling and has been saving for downpayment. He recently received a significant increase in his VA benefits and is no longer eligible for the Section 8 program because his income is too high. He continued with the Section 8 program, at zero HAP, for two months while he completed his purchase of a house in Oakridge. He was able to purchase without a loan after he received the back-pay from the VA and a small inheritance.

The sudden and unexpected changes to the Oregon Tax Deferral Program continue to be problematic for two Section 8 Homeowners. When the Legislature re-visited the rule changes, they choose to alter the new rules for Reverse Mortgages but left the new restrictions on the Tax Deferral program in place. Both Homeowners face the very real possibility of defaulting on their USDA mortgages as their payment has almost doubled. Both families have been referred to the Default Prevention program at NEDCO and are working with a Housing Counselor. One family has applied for a Moratorium: there would be no mortgage payment due for 2 years, and then the unpaid PITI would be added to the end of the loan. HACSA would continue to pay the HAP during the Moratorium period so that no Zero HAP situation would arise. The family would continue to pay the amount they had been paying for their portion of the mortgage payment before the additional taxes were applied. At the end of the Moratorium only the amount of the taxes should be unpaid and would be added to the end of the loan term.

*Ann Rudy*  
*Homeownership Specialist*

HACSA 5 Year Plan 2010 – 2014  
Goals - Section 5.2 of HUD form 50075  
**Update May 2012**

Goal 1 Objective: Increase the number of affordable housing units.

Indicators:        -Build and/or purchase 125 housing units using a mix of local and federal funding.  
                         -Maintain Public Housing vacancies at 3% or less.  
                         -Increase voucher total as private landlords opt-out of their current contracts. Estimated increase is 20 – 50 vouchers.

**Update:**            -**New construction – Roosevelt Crossing, 45 units, Eugene OR, serving case managed ex-offenders.**  
                         -**Purchase and rehab – Hawthorne Apartments, 35 units, Eugene OR, serving mentally ill, case managed residents.**  
                         -**Meeting requirement. PHAS reporting shows Public Housing at 99% occupancy.**

Goal 2 Objective: Continue to receive high performer status.

Indicators:        -Obligate all Capital Funds within 24 months of grant award.  
                         -Expend all Capital Funds within 48 months of grant award.  
                         -Comply with the financial reporting requirements of Asset Management.  
                         -Comply with the new PHAS requirements (when published) to continue to receive high performer status.  
                         -Submit all PHAS reports within required timelines.

**Update:**            -**Meeting requirement. HACSA's FY 11 PHAS score released in April 2012 list our PHAS designation as High Performer. The PHAS report indicates that HACSA is meeting its financial and Capital Fund requirements.**

Goal 3 Objective: Improve community quality of life and economic vitality.

Indicators:        -Continue to encourage and promote resident involvement by maintaining the level of resident-elected Tenant Advisory Group (TAG) representation at the majority of Public and Assisted Housing complexes.  
                         -Assist residents in maintaining Resident Coordinating Groups and/or Resident Councils at the majority of Public and Assisted Housing complexes.  
                         -Assist residents in maintaining Resident Newsletters at the majority of Public and Assisted Housing complexes.  
                         -Annually monitor income levels by development to deconcentrate poverty by bringing higher income PH households into lower income developments and by bringing lower income PH households into higher income developments or vice versa, if necessary.  
                         -Continue giving preference to elderly/disabled applicants at Parkview Terrace, Veneta Villa, Cresview Villa, Riverview Terrace, McKenzie Village (one-bedroom units), Lindeborg Place, and Laurelwood Homes (one-bedroom units).



**Update:**

- Forming a 501c3 to increase funding opportunities to support resident services.
- HACSA received a 3 year Resident Services Coordinator grant to serve Public Housing residents in the Eugene/Springfield metro area. The RSC works with this population to assess their needs and connect them to resources and supportive services that will promote self-sufficiency or increase elderly residents' ability to age in place.
- Outreach continues to all Public and Assisted Housing sites re: TAG opportunities and elections.
- Current TAG reps speak at Resident Meetings as part of outreach efforts to nonparticipating sites.
- Two new Resident Groups have been formed.
- Resident Newsletters are published at all PH and AH sites either monthly or quarterly.

Goal 4 Objective: Promote self-sufficiency and asset development of assisted households.

**Indicators:**

- Maintain a minimum enrollment of 102 Section 8 and 35 Public Housing families in the Family Self-Sufficiency (FSS) Program.
- Maintain a minimum representation of 15 community service agencies on the Family Self-Sufficiency Advisory Board.
- Promote the Family Self-Sufficiency Program, within the Section 8 Program, by presenting FSS information at a minimum of 50% of the new tenant Briefings for new Section 8 participants.
- Continue the promotion of the FSS program through annual mailings of FSS information brochures to all Section 8 and Public Housing residents.
- Assist a minimum of one FSS participants a year in purchasing a home.
- Assist a minimum of one FSS participants in opening an Individual Development Account (IDA) for a down payment on a home.

**Update:**

- 122 S8 families and 54 PH families were enrolled in FSS in the prior 12 month period.
- The FSS Advisory Board currently has 23 members.
- FSS Coordinators provided information about FSS at 96% of all new tenant briefings for S8.
- FSS Brochures are included in all lease up packets for S8 and PH households, and are mailed with annual recertification information packets.
- Additional mailings of brochures have been done as outreach to S8 voucher holders in rural areas and to VASH Voucher holders.
- Two FSS participants purchased homes.
- Seven FSS participants opened IDA's for home ownership (Two opened IDA's for education) (In addition, 13 people continued to put money into their IDA for home ownership, and 6 continued to put money into their IDA for education) (TOTAL open IDA's= 20 for home ownership and 6 for education).

Goal 5 Objective: To provide decent, safe and sanitary housing for very low income families while maintaining their rent payments at an affordable level.

Indicators:     -Review the payment standard yearly and monitor the private market rents so Section 8 families have a greater opportunity to rent outside of poverty areas and increase the supply of housing choices.  
                    -Allow two person households to rent a zero bedroom unit (studio apartment) which allows greater housing opportunities for those households.  
                    -The Section 8 Supervisor will perform quality control inspections of recently completed Housing Quality Standards (HQS) inspections to maintain, decent, safe, and sanitary housing for at least 34 families per year.  
                    -Coordinate and transition privately subsidized families to the Section 8 Voucher Program. This occurs when private landlords terminate (opt out) their contracts with HUD.

Update:           **-Section 8 Director performing quality control inspections.**  
                    **-Meeting other requirements listed above.**

Goal 6 Objective: To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low income families.

Indicators:     -Maintain a professional working relationship with landlords/owners in our community through education and seminars on the Section 8 program. Through quality service to landlords/owners they will recognize the value of renting to Section 8 families. The Section 8 Supervisor will be a board member on the local Rental Owners Association.  
                    -By monitoring the payment standards and area rents on the private market, Section 8 families' portion of rent will remain affordable, while the Agency continues to serve the same number of families as in previous years.

Update:           **-Due to funding, the Section 8 Supervisor's position was eliminated; however, a staff member has been appointed so we continue our presence on the Board of the Rental Owners Association.**  
                    **-Meeting other requirements listed above.**

Goal 7 Objective: Maintain Section 8 Homeownership Program (with subsidy assistance)

Indicators:     - Provide information that relates to our partnerships with other non profit housing providers, availability of down payment assistance, and accessible low interest loans.  
                    -Keep Section 8 participants informed of the program through briefings and informational mailings.  
                    -Homeownership Coordinator to participate as a trainer in the ABC's of Home Ownership Program through Neighborhood Economic Development Corp (NEDCO).

Update:           **-NEDCO provides the ABC's of Homeownership using in-house staff.**  
                    **-Homeownership Coordinator serves on the NEDCO Advisory Board.**  
                    **-FSS Coordinators attend Section Homeownership Information Sessions to maintain the connection between programs.**  
                    **-Meeting other requirements listed above.**



# HACSA

Housing And Community Services Agency of Lane County  
177 Day Island Road, Eugene, OR 97401-2484

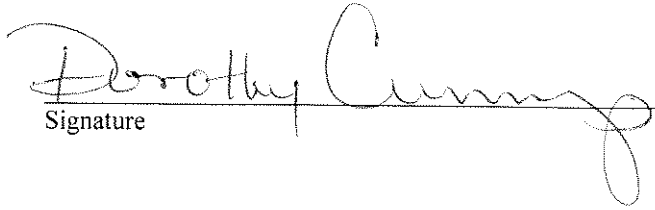
(541) 682-3755 | Fax (541) 682-3411 | TTY (541) 682-3412



July 11, 2012

Re: Form 50075 section 11.f Resident Advisory Board (RAB) comments:

No comments were received.

  
Signature

Deputy Director      7/11/2012  
Title                              Date